

JUN 01 2018

UNITED STATES DISTRICT COURT

for the

Western District of Washington

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

BY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)46 Locations & 65 Vehicles,
as more fully described in Attachment A

Case No.

MJ18-246

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

46 Locations & 65 Vehicles, as more fully described in Attachment A

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B for List of Items to be Seized.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

See Attachment C for List of
Violations.

The application is based on these facts:

See Affidavit of Richard Huntington, DEA Task Force Officer.

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

RICHARD HUNTINGTON, DEA Task Force officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/01/2018

Judge's signature

City and state: Seattle, Washington

BRIAN A. TSUCHIDA, U.S. Magistrate Judge

Printed name and title

Attachment A

List of Locations and Vehicles to be Searched

LOCATIONS TO BE SEARCHED

Warrant No. 1. 332 Northeast 117th Street, Seattle, Washington

332 Northeast 117th Street is a single-family wood frame structure with a detached garage located on the North side of 117th Street west of 5th Avenue Northeast. Both structures are painted yellow with white doors and windows. The front door to the main residence is on the south side and opens facing Northeast 117th Street with "332" posed vertically on the doorframe to the left of the door. The detached garage is offset from the main residence to the north.

Warrant No. 2. 9739 9th Place Southwest Apartment 102, Seattle, Washington

9739 Place Southwest Apartment 102 is a multi-unit townhouse style dwelling with two stories. The townhouse is bright blue on the second story and beige on the bottom floor with white trimmed windows. The residence has a concrete sidewalk that leads from the parking lot which has entrances on both the east and west sides. The numbers "102" are located to the right of the entrance door underneath a porch light. There is a black metal railing to the front left of the townhouse. To the front right there is a red post with the numbers 9739 on it. The numbers 9739 are also posted on the northeast corner of the building. There is the letter "E" posted on the utility door of the building. The front door has a large glass pane. The townhouse is situated in a roadway south of Southwest 97th Street and which is in between 9th Place Southwest and 10th Place Southwest.

Warrant No. 3. 503 North 4th Avenue Southwest, Tumwater, Washington

503 North 4th Avenue Southwest is a two story single-family residence with an attached garage. It is situated on the Northwest corner of 4th Avenue Southwest and Emerson Street Southwest. The residence has the outward appearance of being two or more separate structures, in physical contact with each other, which have been combined to form a single, continuous structure. The front door faces North 4th Avenue SW and there is a garage door facing Emerson Street Southwest. There is a short driveway and parking area accessible from Emerson Street Southwest. There is a sidewalk and paved walkway leading to the front door on North 4th Avenue Southwest. The front door is brown and is situated on an elevated, covered porch with windows on both sides of the door. The portion of the residence that faces North 4th Ave Southwest is light yellow in color with white trim. The portion of the residence that is primarily situated along Emerson Street Southwest is grey with white trim. "503" is displayed on the yellow house siding, just to the left of the front door. There is a porch light immediately above the house numbers.

Attachment A

List of Locations and Vehicles to be Searched

Warrant No. 4. 15108 Southeast 179th Street Apartment 3J, Renton, Washington

15108 Southeast 179th Street Apartment 3J is an apartment at The Carriages at Fairway Downs in Renton, Washington. Building 3 is gray, blue and brown three-story building with white trim in the complex with the number "3" above "15108 SE 179th ST" on the side of the building. Apartment 3J is on the first floor of building 3 with the letters "J" on the door to the unit.

Warrant No. 5. 2407 123rd Street Southeast, Everett, Washington

2407 123rd Street Southeast is a two-story single-family residence which is brown and tan with white trim. The residence has a front facing garage and a fenced back yard. Just to the left of the garage there is a house number posted reading "2407". There is a front door to the residence just to the right of the garage. There is a sliding door on the rear of the residence. The residence is in a small cul-de-sac, which is 123rd Street Southeast west of 25th Avenue Southeast.

Warrant No. 6. 10632 4th Avenue Southwest, Seattle, Washington

10632 4th Avenue Southwest is a residence located on the east side of 4th Avenue Southwest and north of Southwest 108th Street. It is a two-story residence with a beige exterior and white trim. The house has a one-car garage, and the driveway has black chain link fences on both the north and south sides. "10632" is displayed on the west side of the house, to the left of the garage door.

Warrant No. 7. 7721 20th Avenue Southwest, Seattle, Washington

7721 20th Avenue Southwest, Seattle, Washington is a gray multi-level single family residence with white trim located on the west side of 20th Avenue Southwest and south of Southwest Holden Street. The address has an east-facing front door. The numbers "7721" is posted vertically on the right side of the attached garage. There are railings to the left of the garage and to the right of the front door.

Warrant No. 8. 1811 East Howell Street, Seattle, Washington

1811 East Howell Street, Seattle, Washington is a two-story, single-family residence with a basement. It is situated on the south side of East Howell Street, between 18th Avenue and 19th Avenue. There is an alley running along the east side of the house. The house is yellow with white trim. The numbers "1811" appear on the side of the house, above the front door on the door trim. The door is dark in color and has a metal security screen.

Attachment A

List of Locations and Vehicles to be Searched

There is a stairway leading from the sidewalk to the front door. There is another stairway leading from the ally to the fenced back yard.

Warrant No. 9. 21644 29th Avenue South Apartment C, Des Moines, Washington

21644 29th Avenue South is a two-story apartment complex. There are four units on each floor for a total of eight units. The apartment complex is under partial renovation and has recently been painted brown with a large khaki colored triangle on the front (west facing) side. The front/west facing side has the only parking lot for the complex in-between the apartments and 29th Avenue South. The complex is slightly north of South 218th Street and east of 29th Avenue South. There is NO ADDRESS currently on the apartment complex during the renovation. Apartment C is located on the second story and is the northwest apartment. The balcony for Apartment C is visible from 29th Av S. The front door is accessed by walking through the parking lot to the north side of the apartment complex. One must walk through an open fence marked "Private Property". Shortly after the fence gate there is the entryway to the bottom northeast and northwest apartments. There is a narrow staircase, single landing slit staircase up to the second-floor apartments. Apartment C is marked with a "C" on the front door.

Warrant No. 10. 24038 62nd Way South Apartment 19-105, Kent, Washington
24038 62nd Way South Apartment 19-105 is an apartment at Atrium on James. This is a three story tan apartment building with dark grey trim. The building number "19" visible on the north side of the building. Directly below building number sign is the address "24038 62 Way S". Apartment 105 is on the bottom floor of the stairwell on the south side of building 19. The numbers "105" are on a placard on the door.

Warrant No. 11. 1410 Southwest 116th Street, Seattle, Washington
1410 Southwest 116th Street, Seattle, Washington is a one story single-family residence which is off-white in color with light blue/grey trim. There is a driveway on the east side of the house. Residence has a fenced (chain linked) front and rear yard space. Access to the front yard through the fence is via the driveway. There is also a fence separating the front and rear yards with a gate on the west side of the address. The house has a front, south facing, man-trap style entry. The exterior door is a steel bar reinforced door with a standard residential door further in the man-trap. The house numbers "1410" are attached vertically above the exterior door. Just east of the house, and north of the driveway, there is a detached garage with what appears to be a canopy/one piece door facing south. The

Attachment A

List of Locations and Vehicles to be Searched

garage is the same colors as the main residence. The numbers "1410" are attached diagonally upon the garage door. North of the garage is a detached storage shed, the same color as the residence.

Warrant No. 12. 1618 North 26th Street Apartment 205, Mount Vernon, Washington

1618 North 26th Street, Mount Vernon, Washington is a multi-unit apartment building in the Summerghlen apartment complex. The complex is located on the east side of North 26th Street just south of East College Way. Each building in the complex is individually addressed. 1618 is a two-story building located in the southeast portion of the complex and is white with green awnings and green doors and has four stairwells leading to individual sets of units. Apartment 205 is accessed via the second stairwell south of the north side of the building. Apartment 205 is on the second floor and positioned directly in front of the top of the stairs. The white numbers "205" are displayed on the green door of the Apartment.

Warrant No. 13. 2710 South 256th Place Apartment C, Kent, Washington

2710 South 256th Place, Kent, Washington is a multi-unit residence located on the North side of South 256th Place. It is the middle building of three and is tan in color with white trim and a gray roof. There are four units in this building. Apartment C is on the top floor on the West side, accessed by using a flight of stairs from the front. The lower units are clearly marked with letters on the front of their doors. The front of the building is clearly marked with "2710" in gold numbers vertically on the front trim. The letter "C" is marked on the door. There is a backyard behind and below Unit C that is accessible on foot.

Warrant No. 14. 1412 69th Avenue East, Fife, Washington

1412 69th Avenue East is a two story single-family residence which is off white with light grey trim. There is some brick facade on the lower portion of the house next to the garage door and brown shingles on the wall on the second story, facing the street. The residence has a short driveway, garage door, and front porch with the grey front door facing the street. "1412" is on the front of the building, to the left of the garage door, and is posted vertically on the grey trim. The front porch is elevated and covered, with a staircase and paved walkway connecting it to the driveway. The residence is located in a cul-de-sac and there is a wooded hillside at the rear of the residence.

Attachment A

List of Locations and Vehicles to be Searched

Warrant No. 15. 825 30th Avenue, Seattle, Washington

825 30th Avenue, Seattle, Washington is a two-story, single-family residence situated on the West side of 30th Avenue, between E Marion and E Columbia Streets. There is an alley to the West of the house with parking accessed from the alley. The house is cream colored, with light blue trim. The numbers "825" appear vertically on the front of the house. The front door is accessed from small front porch that is elevated above the level of the front yard. The front door has a white security screen over it. The back yard has a short chain-link fence surrounding it.

Warrant No. 16. 4102 South 38th Street, Lower Unit, Tacoma, Washington

4102 South 38th Street is located on the southwest corner of South 38th Street and South Monroe Street in Tacoma Washington. "4102" is labeled in white on the north side of the house. The house is tan with white trim, and has a large deck on the south side of the house, as well as a 6 foot cedar fence enclosing the north part of the yard and a swimming pool. The house is split into two units, an upper and a lower unit. The upper unit's access door opens onto a large second story deck. The lower unit's front door is underneath the deck on the ground floor and faces south. There are several other doors under the deck which face east, but these appear to be for storage. The lower unit entry door is white.

Warrant No. 17. 14581 Northeast 35th Street Apartment F312, Bellevue, Washington

14581 Northeast 35th Street Apartment F312, Bellevue, Washington is an apartment in a three story building in the southern most complex of the Redmond Park Apartments. The building is blue, tan and green in color and faces north. "F" "14581" "NE 35th STREET" is marked on the front of the building. Apartment F312 is located at the top of the west stairwell and to the left. The unit is marked "312" on the door.

Warrant No. 18. 2426 South 224th Street Apartment 102, Des Moines, Washington

2426 South 224th Street Apartment 102 is an apartment at the Pinecreek Apartments located on the north side of South 224th Street. The entrance to access the residence is the second driveway to the East from 24th Avenue South. Once inside that driveway it is

Attachment A

List of Locations and Vehicles to be Searched

the second building. It is a white building with brown trim, a rock façade around the entryway and a dark gray roof. Each building has its own address posted above the entryway. The front entrance to the building faces to the east and displays "2426" above it. There are four units in the building. Apartment 102 is on the lower level down a flight of stairs on the south side (left side as you approach from the front). The unit is marked "102" on the wall next to the door. There is parking on the east (front) and the west (rear) of the building.

Warrant No. 19. 5014 39th Avenue South Apartment 303, Seattle, Washington
5014 39th Avenue South Apartment 303, Seattle, Washington is in a three story multi-unit apartment building on the east side of 39th Avenue South. The building is tan and brown. There are exterior stairs leading up to the third floor. The doors to the units are accessed from an exterior walkway. 5014 39th Avenue South is listed on the exterior of the building on 39th Avenue South. The number "303" is listed on the door of the third floor apartment. There is a parking lot on the east side of the building.

Warrant No. 20. 23030 30th Avenue South Apartment C, Des Moines, Washington
23030 30th Avenue South Apartment C, Des Moines, Washington is an apartment located on the second story of a two-story tan apartment building with white trim. The numbers 23030 are on the trim above a stairwell leading to the second floor. The letter C is on the building just right of the stairwell leading to apartment C on the second floor. The building is east of 30th Avenue South and north of South 231st Street.

Warrant No. 21. 5405 Lakemont Boulevard Southeast Apartment 447, Bellevue, Washington
5405 Lakemont Boulevard Southeast Apartment 447, Bellevue, Washington is an apartment in building 4 of the Overlook at Lakemont Apartment Homes. The building is a four-story building with open stairwells on both the north and south side of the building. The building is also located on a hill with the north side of the building providing access to the four floors. The south side of the building appears to primarily be used for access to the top two floors. The building is gray on the north side and brown on the south side of the building with white trim. The address is marked on both the north and south side of the building. The sign is a large number "4" with the number "5405" underneath. Access to Apartment 447 can be gained on either the north side of the

Attachment A

List of Locations and Vehicles to be Searched

building or the south side of the building. Apartment 447 is located at the top of the stairs and on the north side of the building. The apartment is marked "447" on the door.

Warrant No. 22. 1028 South Meyers Street, Tacoma, Washington

1028 South Meyers Street is located on the west side of South Meyers Street, just north of South 12th Street. The house faces east. The house is a one story, single-family residence which is white in color with white trim. There is no fence. There is a detached two-car garage to the north of the house. "1028" is labeled horizontally to the left of the white front door.

Warrant No. 23. 2132 South 250th Street, Kent, Washington

2132 South 250th Street is located on the northwest corner of 22 Avenue South and South 250th Street. The house faces east and 22 Avenue South. The house is a one story, single-family residence which is blue with white trim. The house also has a red brick façade on the lower half of the house, to the right of the front door. The house has a one car attached garage. There is a chain link fence around the front of the yard, but no gate in front of the driveway. The south side of the property along South 250th Street is bordered by a large hedge. There is a glass storm door in front of the main unpainted wood door. "2132" is labeled vertically to the right of the front door. The back yard can also be accessed from South 250th Street.

Warrant No. 24. 28623 Military Road South Apartment C24, Federal Way, Washington

28623 Military Road South Apartment C24 is an apartment unit located within the "Rainier Continental Apartments" complex. The building address of "28623" is on an exterior sign structure on the east side of the east building facing Military Road South. The multi-story multi-family buildings have beige and gray colored siding. Apartment C24 is occupied at the north end of the western most building. There is an entryway with stairs leading to two units. "C24" is posted above the entryway on the top right corner. After entering the entryway, there is a set of stairs leading up to the second level. At the top of the second level there are two doors facing each other on opposite sides. C24 is the unit on the right with a red colored door.

Warrant No. 25. 3725 South 168th Street, Seatac, Washington

3725 South 168th Street, Seatac, Washington is a two-story blue house with white trim on the south side of South 168th Street to the east of 37th Avenue South. The numbers 3725

Attachment A

List of Locations and Vehicles to be Searched

are posted next to the front door. There is a shed in the backyard area of the property and a carport with a roof, which is also a deck on the east side of the house.

Warrant No. 26. 4813 72nd Place Southwest, Mukilteo, Washington

4813 72nd Place Southwest, Mukilteo, Washington is a two-story house with a full basement and a two car garage. It is light tan in color with light gray trim. The house numbers "4813" are affixed vertically on the trim to the right of the garage. The house is the first one on the left of a small road that starts at the end of a cul-de-sac. The front of the house faces to the east and has two garage bay doors and a porch with three stairs leading up to the front door, which is gray in color. There is a 6-foot-tall chain link fence on the south side and west side of the house. The back yard can be accessed from the front without needing to use a gate. The back of the residence has a residential door on the ground floor to access the basement and a residential door on the next floor up with a deck. There are no stairs leading up to the deck. Partially under the deck is a small garden shed. Beyond the backyard is a playfield that is attached to Mukilteo Elementary School.

Warrant No. 27. 907 Southwest 341st Street, Federal Way, Washington

907 Southwest 341st Street, Federal Way, Washington is a two-story residence that is two-tone brown in color with green shutters and brick around the two-car garage door. It is located on the south side of Southwest 341st Street just east of 10th Court Southwest. The numbers "907" are posted vertically on the front porch post closest to the garage. The front door to this residence faces Southwest 341st Street, but is located on the northeast (left) side of the house.

Warrant No. 28. 13313 Southeast 227th Place, Kent, Washington

13313 Southeast 227th Place, Kent, Washington is a two-story single-family residence. It is tan in color with white trim. It has a one door, two-car garage as well as a one door, single car garage. Both garage doors are tan in color with white trim. The numbers 13313 are displayed vertically on the far-left side trim of the two-car garage door. The front door is up one concrete step to the left of the garage doors, near the east (left) side of the house. It is located in the "Fern Crest" development.

Warrant No. 29. 10507 124th Avenue Northeast, Kirkland, Washington

10507 124th Avenue Northeast, Kirkland, Washington is a light brown two-story home with white trim. The house faces east towards 124th Avenue Northeast with the front

Attachment A

List of Locations and Vehicles to be Searched

entrance on the south side of the home facing Northeast 105th Street above an open carport. The numbers "10507" is posted above open carport. There is a single door on the lower level facing east near the open carport, white in color with a metal screen attached. On the north side of property there is a chain link fence that connects to neighbor to the north. The property does not have any fencing on the south side of the property near the front entrance.

Warrant No. 30. 8448 54th Avenue South, Seattle, Washington

8448 54th Avenue South, Seattle, Washington is a two story single-family residence. It is a split-level house on 54th Avenue South north of South Seward Park Avenue. The front yard of the residence is surrounded by a tall wooden privacy fence that is dark brown in color and built directly next to the sidewalk. The middle of the fence has a wooden pedestrian gate. On the fence post next to the gate affixed vertically are the house numbers "8448". The residence is tan in color with some white trim and fake painted shutters next to the windows. The front pedestrian door is blue in color with a large glass window in the middle of it. The rear of the residence is accessed via a dirt alleyway. There is a large concrete patio/driveway off the alley that leads to the rear of the residence. The rear of the residence has multiple windows with a sliding glass door on the ground floor. There is a small utility shed off to the side close to the alley road.

Warrant No. 31. 20529 61st Place West, Lynnwood, Washington

20529 61st Place West in Lynnwood, Washington is a single story white over brown house located in a cul-de-sac south of 204th Street Southwest at the south end of 61st Place West. The house has a carport on the north side of the house. The "20529" are posted to the right of the front door.

Warrant No. 32. 9604 South 200th Street, Kent, Washington

The residence is a brown house on the north side of South 200th Street east of 96th Avenue South. The numbers "9604" are on the mailbox in front of the residence. There is a wooden fence on the south side of the property that has "9604" on it to the left of the driveway. The numbers "9604" are also posted vertically to the left of the gutter pipe on the southwest corner of the building.

Warrant No. 33. 22247 35th Place South Apartment D104, Kent, Washington

22247 35th Place South Apartment D104, Kent, Washington is an apartment in a multi-level, multi-family apartment building at Skyview 3322. It is light brown in color, with

Attachment A

List of Locations and Vehicles to be Searched

white trim and dark doors. "D" "22247 35th PL S" is displayed on the front of the building outside the stairwell. Apartment number "104" is displayed horizontally on the building to the right of the door on the ground level.

Warrant No. 34. 12807 Renton Avenue South, Seattle, Washington

12807 Renton Avenue South, Seattle, Washington is a residence located on the west side of Renton Avenue South just south of South 128th Street. It is a multi-level house with beige exterior and white gutters. The driveway has two entry/exit points with a chain link fence between them. "12807" is displayed next to the left side of the front door. The front door faces the Renton Avenue South.

Warrant No. 35. 1675 Index Avenue Southeast, Renton, Washington

1675 Index Avenue Southeast, Renton, Washington is a multi-story wood frame single family home. It is located on the south side of Index Avenue Southeast and west of Monroe Avenue Southeast. The house is light brown and white. It features an integrated two-car garage facing Index and a front door to the east of the garage at a higher elevation than the garage itself, which is accessed by stairs. The numbers "1675" are affixed horizontally on the east end of the garage by a pathway to the stairs accessing the front door to the residence.

Warrant No. 36. 2420 Southwest 319th Place, Federal Way, Washington

2420 Southwest 319th Place, Federal Way, Washington is a split-level home with tan siding and white trim located on the north side of Southwest 319th Place and to the east of 25th Avenue Southwest. The home has a two-car garage. The doors of the garage are white with windows on them. The garages are facing the street. The house number "2420" is situated at the top right corner of the garage. The front door is in the middle of the house facing the street with a white storm door.

Warrant No. 37. 8510 10th Avenue West Apartment B213, Everett, Washington

8510 10th Avenue West Apartment B213, Everett, Washington is an apartment at the Nova North apartment complex. Apartment B213 is in a blue and white multi-unit, multi-level apartment building. "Nova North" "B" "8510" is posted above the front entry door of the apartment building. Apartment B213 is on the second floor, west side of the building, and is marked with "B213" vertically to the right of the apartment door.

Attachment A

List of Locations and Vehicles to be Searched

Warrant No. 38. 1628 14th Place Northeast, Issaquah, Washington

1628 14th Place Northeast, Issaquah, Washington is a multi-story single-family residence located on the east side of 14th Place. Northeast. The residence is green with cream-colored trim. There are steps that lead to the brown front door. "1628" is displayed on the front of the residence to the left of the front door. There is an attached garage at the rear of the residence.

Warrant No. 39. 13045 Southeast 26th Street Apartment B103, Bellevue, Washington

13045 Southeast 26th Street Apartment B103 is an apartment unit located within the "Surrey Downs" apartments in Bellevue, Washington. The property is located southwest of Southeast 26th Street and Richards Road. The building address of "B" and "13045" and "B" is posted on the front side of the building, which faces north. The multi-story multi-family building is painted in varying shades of brown and blue. The unit is located on the ground level. "B" over "103" is posted on the front door of the unit.

Warrant No. 40. 3808 South Mason Avenue Apartment E303, Tacoma, Washington

3808 South Mason Avenue Apartment E303, Tacoma, Washington is an apartment at the Mason Avenue Apartments and consists of multiple three-story apartment buildings which are all maroon/blue/tan in color. Building "E" is marked as such and is the first building north of the main office entering the complex. The front entrance to building E is on the north side of the building. The alcove to E303 is the eastern-most of the two alcoves. Apartment E303 is at the top of the stairs on the third level, second unit on the left. E303 occupies the upper-most SE corner of building E. "E303" is posted on the apartment's door.

Warrant No. 41. 949 North 35th Street Apartment 104, Seattle, Washington

949 North 35th St Seattle, Washington is a cream and white four story multi-unit complex with grey/green trim situated on the south side of N 35 St between Albion Pl N (to the east) and Troll Av N (to the west). The numbers 949 are displayed on the northwest corner of the building. Apartment 104 is located on the first floor and is the second unit to the east from the southwest corner of the complex. The numbers "104" are posted to the right of the door. There is a small parking lot situated on the north side (front) of the complex. There is assigned parking on the south side off the alley to the rear

Attachment A

List of Locations and Vehicles to be Searched

of the complex. The alley can be accessed via Albion Pl N or Troll Av N mid-block between N 35 St and N 34 St.

Warrant No. 42. 7923 Martin Luther King Jr. Way South Apartment 302, Seattle, Washington

7923 Martin Luther King Jr. Way South, Apartment 302, Seattle, Washington is a multi-story apartment complex that is cream in color with white trim on the corners and windows and has brown accents. The address number 7923 is clearly affixed to the front of the building on the third-floor level. Apartment 302 is located on the third floor. The door for unit 302 is red and has the number "302" affixed on the door. The building is west of Martin Luther King Jr. Way S and south of South Kenyon Street.

Warrant No. 43. 2604 Cascade Place West Apartment 10, University Place, Washington

2604 Cascade Place West Apartment 10, University Place, Washington is an apartment at the Stratford Heights Apartments. Apartment 10 is located in a three-story apartment building, which is white stucco with dark brown trim and balconies over red brick. The front of this building is on the west side of the building. Apartment 10 is located inside the alcove identified with the numbers "2604", which are posted on the back wall of the second (street) level. Apartment 10 is located at the bottom of one flight of stairs in this alcove, almost directly in front of the stairs. The front main door of Apartment 10 is red in color and has the numbers "10" posted just to the right of this door. The rear side of this building (the east side) has several white single car garage doors and numerous yellow man-doors, which do not appear to be marked with unit numbers. It appears that Apartment 10's rear yellow door is the fourth yellow door south of the north end of the building.

Warrant No. 44. 21557 35th Place West, Brier, Washington

21557 35th Place West is a light brown two story single family home with attached garage. The house is situated on the east side of 35th Place West and south of 214th Street Southwest. 35th Place West is just east of 35th Avenue West. On the front of the house there are four columns painted white. Stairs lead to the front door between the middle two columns. The garage door is white and the garage is attached on the east side of the residence. There is a deck on the south side of the house.

Attachment A

List of Locations and Vehicles to be Searched

Warrant No. 45. 5720 220th Street Southwest, Mountlake Terrace, Washington
 5720 220th Street Southwest is a gray with white trim multi-story commercial property that appears to be split in two units with a portion elevated above the roof levels of both units. A letter "A" is on the front of the east half of the building and a letter "B" is on the front of the west half of the building. The entrance door on office A is white in color. The numbers "5720" are mounted to the left of the door. Often there is a green, orange, and white business sign displayed on the planting strip in front of the building. The sign reads "M Morgan Handyman and Remodel". The building is located east of 58th Avenue West and south of 220th Street Southwest.

Warrant No. 46. 9220 South 198th Street, Renton, Washington
 9220 South 198th Street Renton, Washington is a two-story, single-family residence situated on the north side of South 198th Street, between 95th Avenue South and 92nd Avenue South. The house sits at the back of the lot and is accessed by a long gravel driveway. There are tall trees, including palm trees in the front yard. The house is grey with grey and white trim. There is a mailbox near the street with the numbers "9220" printed on it, and the numbers "9220" also appear on the side of the house above one of the garage doors. There are two garage doors on the front of the house. The front door is brown and near ground level.

VEHICLES TO BE SEARCHED

Warrant No. 47.	black 2001 Mercedes 430 with Washington license AZX8884
Warrant No. 48.	white 2006 BMW 325 with Washington license BIU4803
Warrant No. 49.	gold 2005 Ford Taurus with Washington license SH11119
Warrant No. 50.	black 2009 Chrysler 300 with Washington license BDG7917
Warrant No. 51.	gold 1998 Range Rover with Washington license BHX9476
Warrant No. 52.	silver 2015 Chevrolet Silverado with Washington license WSU386G
Warrant No. 53.	black 2015 Range Rover with Washington license BJK9871
Warrant No. 54.	gray 2004 Volvo Wagon with Washington license BDF6399
Warrant No. 55.	green 1979 Chevrolet El Camino with Washington license B35016L
Warrant No. 56.	silver 2002 Mercedes S55 with Washington license BAL1564
Warrant No. 57.	silver 2005 Audi A4 with Washington license BHH5506
Warrant No. 58.	blue 2006 Lexus GS with Washington license BEU1152
Warrant No. 59.	maroon 1991 Lexus LS with Washington license AVP0284

Attachment A

List of Locations and Vehicles to be Searched

Warrant No. 60.	black 2000 Lexus RX with Washington license BEP5598
Warrant No. 61.	beige 2002 Buick Century with Washington license BEN1663
Warrant No. 62.	brown 2001 Buick LeSabre with Washington license AVN4805
Warrant No. 63.	black and tan 1979 Mercury Cougar with Washington license AIP0343
Warrant No. 64.	black 2017 Ford Explorer with Washington temporary license A3421042 listing (VIN) 1FM5K8GT2HGE00414
Warrant No. 65.	brown 2001 GMC Yukon with Washington license BAE9909
Warrant No. 66.	gray 2009 Chevrolet Impala with Washington license BBK1418
Warrant No. 67.	black 2007 Cadillac Escalade with Washington license BHY8148
Warrant No. 68.	black 2000 Chevrolet Tahoe with Washington license AUA9717
Warrant No. 69.	green 1996 Honda Accord with Washington license BJC9550
Warrant No. 70.	black 2018 GMC Acadia with Washington license BIX8744
Warrant No. 71.	red 2001 Kia Soul with Washington license AWE7583
Warrant No. 72.	blue 2012 Audi Q5 with Washington license ARL6025
Warrant No. 73.	gray 2006 Volkswagen Passat with Washington license BHK7700
Warrant No. 74.	black 2007 Chevy Tahoe with Washington license BKA4496
Warrant No. 75.	white 2004 Honda Odyssey with Florida license ECIT67
Warrant No. 76.	silver 2006 Honda Odyssey with Florida license 7151IA
Warrant No. 77.	gray 2001 Lexus ES with Washington license BHJ4065
Warrant No. 78.	blue 2004 Chevrolet Tahoe with Washington license BFR8025
Warrant No. 79.	maroon 1992 Honda Accord with Washington license BIF4770
Warrant No. 80.	white 2015 Hyundai Sonata with Washington license AVX0558
Warrant No. 81.	red 2015 Chevrolet Camaro with Washington license AVF3570
Warrant No. 82.	black 2008 Dodge Charger with Washington license APK4646
Warrant No. 83.	black 2011 Chevy Camaro with Washington license AZW6725
Warrant No. 84.	maroon 2005 Chevrolet Impala with Washington license BHX9836
Warrant No. 85.	blue 1997 Buick Park Avenue with Washington license AWX3675
Warrant No. 86.	gray 1997 Chevrolet Tahoe with Washington license AVP0293
Warrant No. 87.	blue 2007 Chevrolet HHR with Washington license AXP3487
Warrant No. 88.	white 2015 Kia Sorento with Washington license ATS1433
Warrant No. 89.	white 2008 Ford F-150 with Washington license B88559Y
Warrant No. 90.	black 2004 Audi Wagon with Washington license BGJ0165
Warrant No. 91.	black 2011 BMW 535 with Washington license AYW1075
Warrant No. 92.	gray 1999 GMC Yukon with Washington license BIH2904
Warrant No. 93.	silver 2002 Honda Accord with Washington license BGH9778

Attachment A

List of Locations and Vehicles to be Searched

Warrant No. 94.	black 2017 Honda Pilot with Washington license BJK4798
Warrant No. 95.	gray 2011 Chevrolet Silverado with Washington license C41908L
Warrant No. 96.	black 2007 Toyota Camry with Washington license BHY9139
Warrant No. 97.	black 2009 Mercedes Coupe with Washington license BBY1137
Warrant No. 98.	black 2002 Dodge Durango with British Columbia license FN508A
Warrant No. 99.	blue 2012 BMW 750 with Washington license BBJ1643
Warrant No. 100.	blue 2003 Jaguar with Washington license AZJ2575
Warrant No. 101.	silver 2010 Mercedes S550 with Washington license BDT6285
Warrant No. 102.	black 2013 Hyundai Azera with Washington license BIH2915
Warrant No. 103.	black 2007 Lexus LS with Washington license BCH9981
Warrant No. 104.	black 2015 Acura TLX with Washington license BHX7569
Warrant No. 105.	gold 1995 Lexus LS with Washington license BHY4179
Warrant No. 106.	black 2009 BMW 750 with Washington license BCG6090
Warrant No. 107.	white 2000 GMC Savana with Washington license 058ZAD
Warrant No. 108.	green 2002 Honda Civic with Washington license BGK1218
Warrant No. 109.	silver 2006 Honda Odyssey with Washington license AUJ9144
Warrant No. 110.	gray 2002 BMW X5 with Washington license BGE2269
Warrant No. 111.	black 2005 Mercedes 320 with Washington license 177XPM

Attachment B

List of Items to be Searched for and Seized

This warrant authorizes the government to search for and seize the following items:

Evidence and/or fruits of the commission of the following crimes: Distribution of, and possession with intent to distribute, cocaine, methamphetamine, and heroin, and conspiracy to commit these offenses, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and 846; Money laundering and conspiracy to launder money, in violation of Title 18, United States Code, Sections 1956 and 1956(h); Use of communication facilities to commit, facilitate, or further an act or acts which constitute a felony in violation of Title 21, United States Code, Section 843(b); Interstate and foreign travel to promote, manage, establish, carry on, or facilitate unlawful activity, in violation of Title 18, United States Code, Section 1952; Possession of a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c); and, Felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g), as follows:

1. **Controlled Substances:** Including but not limited to cocaine, cocaine base in the form of crack cocaine, heroin, oxycodone and/or other diverted prescription drugs, and methamphetamine.
2. **Drug Paraphernalia:** Items used, or to be used, to store, process, package, use, and/or distribute controlled substances, such as plastic bags, cutting agents, scales, measuring equipment, tape, hockey or duffel bags, chemicals or items used to test the purity and/or quality of controlled substances, and similar items.
3. **Drug Transaction Records:** Documents such as ledgers, receipts, notes, and similar items relating to the acquisition, transportation, and distribution of controlled substances, including such records stored in electronic format.
4. **Customer and Supplier Information:** Items identifying drug customers and drug suppliers, such as telephone records, personal address books, correspondence, diaries, calendars, notes with phone numbers and names, "pay/owe sheets" with drug amounts and prices, maps or directions, and similar items, including such records stored in electronic format.
5. **Cash and Financial Records:** Currency and financial records, including bank records, safe deposit box records and keys, credit card records, bills, receipts, tax returns, vehicle documents, and similar items; other records that show income and expenditures, net worth, money transfers, wire transmittals, negotiable instruments, bank

Attachment B

List of Items to be Searched for and Seized

drafts, cashier's checks, and similar items, including such records stored in electronic format; and money counters.

6. **Photographs/Surveillance:** Photographs, video tapes, digital cameras, surveillance cameras, and associated hardware/storage devices, and similar items, depicting property occupants, friends and relatives of the property occupants, or suspected buyers or sellers of controlled substances, controlled substances or other contraband, weapons, and assets derived from the distribution of controlled substances, including such records stored in electronic format.

7. **Weapons:** Firearms, magazines, ammunition, and body armor, and other weapons-related items such as holsters and equipment to clean firearms.

8. **Codes:** Evidence of codes used in the distribution of controlled substances, including but not limited to passwords, code books, cypher or decryption keys, and similar information.

9. **Property Records:** Deeds, contracts, escrow documents, mortgage documents, rental documents, and other evidence relating to the purchase, ownership, rental, income, expenses, or control of the premises, and similar records of other property owned or rented.

10. **Indicia of occupancy,** residency, and/or ownership of assets including, but not limited to, utility and telephone bills, canceled envelopes, rental records or payment receipts, leases, mortgage statements, and other documents.

11. **Evidence of Storage Unit Rental or Access:** rental and payment records, keys and codes, pamphlets, contracts, contact information, directions, passwords, or other documents relating to storage units.

12. **Evidence of Personal Property Ownership:** Registration information, ownership documents, or other evidence of ownership of personal property including, but not limited to, vehicles, vessels, boats, airplanes, jet skis, all-terrain vehicles, RVs, and other personal property; evidence of international or domestic travel, hotel/motel stays; and any other evidence of unexplained wealth.

13. **Individual and business financial books,** records, receipts, notes, ledgers, diaries, journals, and all records relating to income, profit, expenditures, or losses, such as:

Attachment B

List of Items to be Searched for and Seized

- a. Employment records: paychecks or stubs, lists and accounts of employee payrolls, records of employment tax withholdings and contributions, dividends, stock certificates, and compensation to officers.
 - b. Savings accounts: statements, ledger cards, deposit tickets, register records, wire transfer records, correspondence, and withdrawal slips.
 - c. Checking accounts: statements, canceled checks, deposit tickets, credit/debit documents, wire transfer documents, correspondence, and register records.
 - d. Loan Accounts: financial statements and loan applications for all loans applied for, notes, loan repayment records, and mortgage loan records.
 - e. Collection accounts: statements and other records.
 - f. Certificates of deposit: applications, purchase documents, and statements of accounts.
 - g. Credit card accounts: credit cards, monthly statements, and receipts of use.
 - h. Receipts and records related to gambling wins and losses, or any other contest winnings.
 - i. Insurance: policies, statements, bills, and claim-related documents.
 - j. Financial records: profit and loss statements, financial statements, receipts, balance sheets, accounting work papers, any receipts showing purchases made, both business and personal, receipts showing charitable contributions, and income and expense ledgers.
14. All bearer bonds, letters of credit, money drafts, money orders, cashier's checks, travelers checks, Treasury checks, bank checks, passbooks, bank drafts, money wrappers, stored value cards, and other forms of financial remuneration evidencing the obtaining, secreting, transfer, and/or concealment of assets and/or expenditures of money.
15. All Western Union and/or Money Gram documents and other documents evidencing domestic or international wire transfers, money orders, official checks, cashier's checks, or other negotiable interests that can be purchased with cash. These documents are to include applications, payment records, money orders, frequent customer cards, etc.
16. Negotiable instruments, jewelry, precious metals, financial instruments, and other negotiable instruments.
17. Documents reflecting the source, receipt, transfer, control, ownership, and disposition of United States and/or foreign currency.

Attachment B

List of Items to be Searched for and Seized

18. Correspondence, papers, records, and any other items showing employment or lack of employment.

19. Telephone books, and/or address books, facsimile machines to include the other memory system, any papers reflecting names, addresses, telephone numbers, pager numbers, cellular telephone numbers, facsimile, and/or telex numbers, telephone records and bills relating to co-conspirators, sources of supply, customers, financial institutions, and other individuals or businesses with whom a financial relationship exists. Also, telephone answering devices that record telephone conversations and the tapes therein for messages left for or by co-conspirators for the delivery or purchase of controlled substances or laundering of drug proceeds.

20. Safes and locked storage containers, and the contents thereof that are otherwise described in this document.

21. Tools: Tools that may be used to open hidden compartments in vehicles, paint, bonding agents, magnets, or other items that may be used to open/close or conceal said compartments.

22. Cell Phones: Cellular telephones and other communications devices including smartphones (i.e., iPhones, Android phones, Blackberries, and the like) may be seized, and searched for the following items:

- a. Assigned number and identifying telephone serial number (ESN, MIN, IMSI, or IMEI);
- b. Stored list of recent received, sent, and missed calls;
- c. Stored contact information;
- d. Stored photographs of narcotics, currency, firearms, or other weapons, evidence of suspected criminal activity, and/or the user of the phone or suspected co-conspirators, including any embedded GPS data associated with those photographs;
- e. Stored photographs of real estate, or other records pertaining to the purchase, sale, lease, or renovation of real property including any embedded GPS data associated with those photographs;
- f. Stored text messages, as well as any messages in any internet messaging apps, including but not limited to Facebook Messenger, iMessage, Wikr, Telegram, Signal, WhatsApp, and similar messaging applications.

Attachment C

List of Offenses

The search is related to a violation(s) of the following:

- a. Distribution of, and possession with intent to distribute, cocaine, methamphetamine, and heroin, and conspiracy to commit these offenses, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and 846;
- b. Money laundering and conspiracy to launder money, in violation of Title 18, United States Code, Sections 1956 and 1956(h);
- c. Use of communication facilities to commit, facilitate, or further an act or acts which constitute a felony in violation of Title 21, United States Code, Section 843(b);
- d. Interstate and foreign travel to promote, manage, establish, carry on, or facilitate unlawful activity, in violation of Title 18, United States Code, Section 1952;
- e. Possession of a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c); and
- f. Felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g).

AFFIDAVIT

County of King)
)
 State of Washington)

Richard Huntington, being first duly sworn on oath, deposes and says:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer (TFO) with the Drug Enforcement Administration (DEA), and have been so deputized since May 2008. I am currently employed as a Police Officer with the City of Seattle and have been so employed since August of 1997. In my capacity as a Task Force Officer, I conduct investigations of the Controlled Substance Act, that is, Title 21, United States Code, Sections 841, et seq., and related offenses. I have personally participated in hundreds of investigations, arrests, and seizures relating to the manufacture, distribution, and transportation of controlled substances, and offenses related to controlled substances violations such as money laundering. This includes investigations involving the use of informants, the use of undercover agents, the execution of search warrants, and Title III investigations.

2. I have encountered and have become familiar with various tools, methods, trends, paraphernalia, and related articles utilized by various traffickers in their efforts to import, export, conceal and distribute controlled substances. I am also familiar with the manner in which drug traffickers use telephones, often cellular telephones, to conduct their unlawful operations, and how they code their conversations to disguise their unlawful activities.

3. I have participated in the debriefing of defendants, witnesses, and informants, during which time I have discussed with them their methods of drug smuggling, distribution, packaging, trafficking, avoiding law enforcement, and laundering proceeds, among other concerns related to drug trafficking. I have discussed and learned from other law enforcement investigators in regards to these matters as well.

AFFIDAVIT OF RICHARD HUNTINGTON- 1

UNITED STATES ATTORNEY
 700 STEWART STREET, SUITE 5220
 SEATTLE, WASHINGTON 98101
 (206) 553-7970

4. In addition to practical experience, I have received formal training in controlled substances enforcement. This includes training regarding controlled substance recognition, field testing, undercover investigations, telecommunications analysis, surveillance techniques, financial investigations, and clandestine laboratories.

PURPOSE OF THE AFFIDAVIT

5. As described herein, there is probable cause to believe that the following offenses have been committed, and are being committed, by Michael Morgan, Charles Cheatham, Michael Davis, Railen Wheeler, Joseph Wilson, Crystal Barquet, Wesley Armstrong, Nakita Cannady, Nathaniel Wells, Adam Smith, Marqus Jones, Michael Safford, Jerome Wilson, Alonzo Baggett, Eddrick Baker, Martin Banks, Branden Barnett, Carlos Dennis, Dominique Jimerson, Bradford Street, Donnie Cheatham, Ventoe Woods, Michael Young, Cleophus Shepard, Luis Perez-Cruz, Tiffany Younger, Lamont Reynolds, Waunika Walker, Rasheed Echols, Stacy Humphrey, Mechellay Broadnax, Nonis Clayton, Carlisa McNeal, Santichith Hochingnavong, Chryar Mitchell, Danavian Hunter, Calvin Thomas, Walter Robinson, James Mayers, Leonard Haywood, Bobby Beasley, Antonio Wiggins, Dennis Herold, Jakari Armstrong, Christopher Clay, Patrick Williams, Johnny Davis, Ernie Davis, Larry Holloway, Jihad Zeigler, Edward Locke, Lovell Brown, Jevon Gipson, Robert Otero, Tabid Mohamed, Jon Williams, Anthony Dao, and Kimberly Guadalupe.

a. Distribution of, and possession with intent to distribute, cocaine, methamphetamine, and heroin, and conspiracy to commit these offenses, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1), and 846;

b. Money laundering and conspiracy to launder money, in violation of Title 18, United States Code, Sections 1956 and 1956(h);

c. Use of communication facilities to commit, facilitate, or further an act or acts which constitute a felony in violation of Title 21, United States Code, Section 843(b);

1 d. Interstate and foreign travel to promote, manage, establish, carry on,
2 or facilitate unlawful activity, in violation of Title 18, United States Code, Section
3 1952;

4 e. Possession of a firearm in furtherance of a drug trafficking crime, in
5 violation of Title 18, United States Code, Section 924(c); and

6 f. Felon in possession of a firearm, in violation of Title 18, United
7 States Code, Section 922(g).

8 6. I make this Affidavit in support of an application for warrants authorizing
9 searches of the subject locations and vehicles,¹ which are further described below and in
10 Attachment A (attached hereto and incorporated by reference as if fully set forth herein),
11 for evidence, fruits and instrumentalities, as further described in Attachment B (attached
12 hereto and incorporated by reference as if fully set forth herein), of violations of the
13 above-listed statutes, committed by the subjects listed above, and others, as described
14 herein.

15 7. For each of the following locations, I request that authority to search extend
16 to all parts of the property, including main structure, garage(s), storage structures,
17 outbuildings, and curtilage, and all vehicles, containers, compartments, or safes located
18 on the property, whether locked or not where the items described in Attachment B (list of
19 items to be seized) could be found. For each of the following vehicles, authority to search
20 extends to all parts of the vehicle and any cases, containers, compartments, or safes
21 located in the vehicle, whether locked or not, where the items described in Attachment B
22 (list of items to be seized) could be found. Additionally, as is discussed herein, members
23 of this conspiracy have been known to use vehicles with hidden compartments. For this
24 reason, I am requesting that if agents are unable to thoroughly search or access a
25 particular area of a vehicle at the location where the vehicle is found, the vehicle may be
26 transported to another location where they would have at their disposal the appropriate
27

28 ¹ The residences and vehicles to be searched are highlighted in bold font in this affidavit.
AFFIDAVIT OF RICHARD HUNTINGTON- 3

1 tools and equipment to properly search the vehicle, and the search may continue at that
2 location.

3 8. I am seeking warrants for the following subject locations²:

4 **332 Northeast 117th Street, Seattle, Washington.** Adam Smith resides
5 here. The probable cause with respect to this residence is discussed at paragraphs
6 85 to 103.

7 **9739 9th Place Southwest, Unit 102, Seattle, Washington.** Jerome Wilson
8 resides here. The probable cause with respect to this residence is discussed at
9 paragraphs 114 to 125.

10 **503 North 4th Avenue Southwest, Tumwater, Washington.** Alonzo
11 Baggett resides here. The probable cause with respect to this residence is
12 discussed at paragraphs 126 to 142.

13 **15108 Southeast 179th Street, Apartment 3J, Renton, Washington.**
14 Branden Barnett resides here. The probable cause with respect to this residence is
15 discussed at paragraphs 163 to 178.

16 **2407 123rd Street Southeast, Everett, Washington.** Carlos Dennis
17 resides here. The probable cause with respect to this residence is discussed at
18 paragraphs 179 to 186.

19 **10632 4th Avenue Southwest, Seattle, Washington.** Dominique Jimerson
20 resides here. The probable cause with respect to this residence is discussed at
21 paragraphs 187 to 198.

22 **7721 20th Avenue Southwest, Seattle, Washington.** Bradford Street
23 resides here. The probable cause with respect to this residence is discussed at
24 paragraphs 199 to 213.

25
26
27
28 ² I have verified the descriptions of the subject properties and vehicles, either by personally viewing them myself, or
through my discussions with other law enforcement officers who have personally viewed them.

1 **1811 East Howell Street, Seattle, Washington.** Donnie Cheatham resides
2 here. The probable cause with respect to this residence is discussed at paragraphs
3 214 to 226.

4 **21644 29th Avenue South, Apartment C, Des Moines, Washington.**
5 Ventoe Woods resides here. The probable cause with respect to this residence is
6 discussed at paragraphs 227 to 233.

7 **24038 62nd Way South, Apartment 19-105, Kent, Washington.** Michael
8 Young resides here. The probable cause with respect to this residence is discussed
9 at paragraphs 234 to 247.

10 **1410 Southwest 116th Street, Seattle, Washington.** Cleophus Shepard
11 resides here. The probable cause with respect to this residence is discussed at
12 paragraphs 248 to 259.

13 **1618 North 26th Street, Apartment 205, Mount Vernon, Washington.**
14 Luis Perez-Cruz. The probable cause with respect to this residence is discussed at
15 paragraphs 260 to 278.

16 **2710 South 256th Place, Apartment C, Kent, Washington.** Tiffany
17 Younger resides here and Charles Cheatham uses this location to store drugs and
18 proceeds. The probable cause with respect to this residence is discussed at
19 paragraphs 109, 135, 279 to 285, and 287 note 20.

20 **1412 69th Avenue East, Fife, Washington.** Charles Cheatham and
21 Lamont Reynolds reside here. The probable cause with respect to this residence is
22 discussed at paragraphs 108, 166, and 286-321.

23 **825 30th Avenue, Seattle, Washington.** Michael Davis uses this location.
24 The probable cause with respect to this residence is discussed at paragraphs 322 to
25 329 and 352.

26 **4102 South 38th Street, Lower Unit, Tacoma, Washington.** Waunika
27 Walker resides here. The probable cause with respect to this residence is discussed
28 at paragraphs 330 to 342.

1 **14581 Northeast 35th Street, Apartment F312, Bellevue, Washington.**

2 Rasheed Echols resides here. The probable cause with respect to this residence is
3 discussed at paragraphs 343 to 361.

4 **2426 South 224th Street, Apartment 102, Des Moines, Washington.**

5 Stacy Humphrey resides here. The probable cause with respect to this residence is
6 discussed at paragraphs 362 to 371.

7 **5014 39th Avenue South, Apartment 303, Seattle, Washington.**

8 Mechellay Broadnax resides here as does Michael Davis on a part time basis. The
9 probable cause with respect to this residence is discussed at paragraphs 372 to 381.

10 **23030 30th Avenue South, Apartment C, Des Moines, Washington.**

11 Nonis Clayton resides here. Michael Davis has sometimes stayed here. The
12 probable cause with respect to this residence is discussed at paragraphs 382 to 396.

13 **5405 Lakemont Boulevard Southeast, Apartment 447, Bellevue,**

14 **Washington.** Carlisa McNeal resides here. Michael Davis sometimes stays here.

15 The probable cause with respect to this residence is discussed at paragraphs 397 to
16 403.

17 **1028 South Meyers Street, Tacoma, Washington.** Chryar Mitchell

18 resides here. The probable cause with respect to this residence is discussed at
19 paragraphs 432 to 442.

20 **2132 South 250th Street, Kent, Washington.** Chryar Mitchell is often at

21 this residence. The probable cause with respect to this residence is discussed at
22 paragraphs 432 to 442.

23 **28623 Military Road South, Apartment C24, Federal Way,**

24 **Washington.** Danavian Hunter resides here. The probable cause with respect to
25 this residence is discussed at paragraphs 433 to 434 and 443 to 473.

26 **3725 South 168th Street, SeaTac, Washington.** Joseph Wilson resides

27 here. The probable cause with respect to this residence is discussed at paragraphs
28 484 to 494.

1 **4813 72nd Place Southwest, Mukilteo, Washington.** James Mayers
2 resides here. The probable cause with respect to this residence is discussed at
3 paragraphs 501 to 518.

4 **907 Southwest 341st Street, Federal Way, Washington.** Leonard
5 Haywood resides here. The probable cause with respect to this residence is
6 discussed at paragraphs 519 to 529.

7 **13313 Southeast 227th Place, Kent, Washington.** Bobby Beasley resides
8 here. The probable cause with respect to this residence is discussed at paragraphs
9 530 to 536.

10 **10507 124th Avenue Northeast, Kirkland, Washington.** Christopher
11 Clay resides here. The probable cause with respect to this residence is discussed at
12 paragraphs 580 to 607.

13 **8448 54th Avenue South, Seattle, Washington.** Railen Wheeler resides
14 here. The probable cause with respect to this residence is discussed at paragraphs
15 533, 561, 574, 579, 587 to 588, and 608 to 616.

16 **20529 61st Place West, Lynnwood, Washington.** Railen Wheeler also
17 maintains this residence. The probable cause with respect to this residence is
18 discussed at paragraphs 608 to 616 and 817.

19 **9604 South 200th Street, Kent, Washington.** Patrick Williams resides
20 here. The probable cause with respect to this residence is discussed at paragraphs
21 621 to 632.

22 **22247 35th Place South, Apartment D104, Kent, Washington.** Johnny
23 Davis resides here. The probable cause with respect to this residence is discussed
24 at paragraphs 633 to 647.

25 **12807 Renton Avenue South, Seattle, Washington.** Ernie Davis resides
26 here. The probable cause with respect to this residence is discussed at paragraphs
27 644, 648 to 661, and 682 note 34.
28

1 **1675 Index Avenue Southeast, Renton, Washington.** Larry Holloway
2 resides here. The probable cause with respect to this residence is discussed at
3 paragraphs 662 to 672 and 682 note 33.

4 **2420 Southwest 319th Place, Federal Way, Washington.** Jihad Zeigler
5 resides here. The probable cause with respect to this residence is discussed at
6 paragraphs 673 to 684.

7 **8510 10th Avenue West, Apartment B213, Everett, Washington.**
8 Edward Locke resides here. The probable cause with respect to this residence is
9 discussed at paragraphs 685 to 700.

10 **1628 14th Place Northeast, Issaquah, Washington.** Lovell Brown resides
11 here. The probable cause with respect to this residence is discussed at paragraphs
12 701 to 714.

13 **13045 Southeast 26th Street, Apartment B103, Bellevue, Washington.**
14 Crystal Barquet resides here. The probable cause with respect to this residence is
15 discussed at paragraphs 53, 444, 448, and 715 to 731.

16 **3808 South Mason Avenue Apartment E303, Tacoma, Washington.**
17 Jevon Gipson resides here. The probable cause with respect to this residence is
18 discussed at paragraphs 732 to 739.

19 **949 North 35th Street, Apartment 104, Seattle, Washington.** Robert
20 Otero resides here. The probable cause with respect to this residence is discussed
21 at paragraphs 740 to 757 and 822.

22 **7923 Martin Luther King Jr. Way South, Apartment 302, Seattle,**
23 **Washington.** Tabid Mohamed resides here. The probable cause with respect to
24 this residence is discussed at paragraphs 758 to 771.

25 **2604 Cascade Place West, Apartment 10, University Place,**
26 **Washington.** Jon Williams resides here. The probable cause with respect to this
27 residence is discussed at paragraphs 772 to 787.
28

1 **21557 35th Place West, Brier, Washington.** Michael Morgan and
 2 Kimberly Guadalupe reside here. The probable cause with respect to this residence
 3 is discussed at paragraphs 808 to 813.

4 **5720 220th Street Southwest, Mount Lake Terrace, Washington.** This is
 5 Morgan Real Estate Management and Morgan Handyman and Remodel. Kimberly
 6 Guadalupe operates these businesses. The probable cause with respect to this
 7 address is discussed at paragraphs 754, 811, and 814 to 830.

8 **9220 South 198th Street, Renton, Washington.** Anthony Dao resides
 9 here. The probable cause with respect to this residence is discussed at paragraphs
 10 788 to 807.

11 9. I am also seeking warrants for the following subject vehicles:

12 **A black 2001 Mercedes 430 with Washington license AZX8884.** Jerome
 13 Wilson uses this vehicle. Hereinafter the "black Mercedes 430 (AZX8884)." The
 14 probable cause with respect to this vehicle is discussed at paragraphs 114 to 125.

15 **A white 2006 BMW 325 with Washington license BIU4803.** Jerome
 16 Wilson owns this vehicle. Hereinafter the "white BMW SD (BIU4803)." The
 17 probable cause with respect to this vehicle is discussed at paragraphs 114 to 125.

18 **A gold 2005 Ford Taurus with Washington license SH11119.** Alonzo
 19 Baggett drives this vehicle. Hereinafter the "gold Ford Taurus (SH11119)." The
 20 probable cause with respect to this vehicle is discussed at paragraphs 126 to 142.

21 **A black 2009 Chrysler 300 with Washington license BDG7917.** Eddrick
 22 Baker drives this vehicle. Hereinafter the "black Chrysler 300 (BDG7917)." The
 23 probable cause with respect to this vehicle is discussed at paragraphs 143 to 154.

24 **A gold 1998 Range Rover with Washington license BHX9476.** Branden
 25 Barnett drives this vehicle. Hereinafter the "gold Range Rover (BHX9476)." The
 26 probable cause with respect to this vehicle is discussed at paragraphs 163 to 178.

27 **A silver 2015 Chevrolet Silverado with Washington license WSU386G.**
 28 Carlos Dennis drives this vehicle. Hereinafter the "silver Chevrolet Silverado

1 (WSU386G)." The probable cause with respect to this vehicle is discussed at
2 paragraphs 179 to 186.

3 **A black 2015 Range Rover with Washington license BJK9871.** Carlos
4 Dennis drives this vehicle. Hereinafter the "black Range Rover (BJK9871)." The
5 probable cause with respect to this vehicle is discussed at paragraphs 179 to 186.

6 **A gray 2004 Volvo Wagon with Washington license BDF6399.**
7 Dominique Jimerson drives this vehicle. Hereinafter the "gray Volvo Wagon
8 (BDF6399)." The probable cause with respect to this vehicle is discussed at
9 paragraphs 187 to 198.

10 **A green 1979 Chevrolet El Camino with Washington license B35016L.**
11 Dominique Jimerson drives this vehicle. Hereinafter the "green Chevrolet El
12 Camino (B35016L)." The probable cause with respect to this vehicle is discussed
13 at paragraphs 187 to 198.

14 **A silver 2002 Mercedes S55 with Washington license BAL1564.**
15 Bradford Street drives this vehicle. Hereinafter the "silver Mercedes S55
16 (BAL1564)." The probable cause with respect to this vehicle is discussed at
17 paragraphs 199 to 213 and 319.

18 **A silver 2005 Audi A4 with Washington license BHH5506.** Bradford
19 Street owns this vehicle. Hereinafter the "silver Audi A4 (BHH5506)." The
20 probable cause with respect to this vehicle is discussed at paragraphs 199 to 213.

21 **A blue 2006 Lexus GS with Washington license BEU1152.** Ventoe
22 Woods drives this vehicle. Hereinafter the "blue Lexus GS (BEU1152)." The
23 probable cause with respect to this vehicle is discussed at paragraphs 227 to 233.

24 **A maroon 1991 Lexus LS with Washington license AVP0284.** Michael
25 Young drives this vehicle. Hereinafter the "maroon Lexus LS (AVP0284)." The
26 probable cause with respect to this vehicle is discussed at paragraphs 234 to 247.
27
28

1 **A black 2000 Lexus RX with Washington license BEP5598.** Cleophus
2 Shepard drives this vehicle. Hereinafter the "black Lexus RX (BEP5598)." The
3 probable cause with respect to this vehicle is discussed at paragraphs 248 to 259.

4 **A beige 2002 Buick Century with Washington license BEN1663.**
5 Cleophus Shepard drives this vehicle. Hereinafter the "beige Buick Century
6 (BEN1663)." The probable cause with respect to this vehicle is discussed at
7 paragraphs 248 to 259.

8 **A brown 2001 Buick LeSabre with Washington license AVN4805.**
9 Cleophus Shepard drives this vehicle. Hereinafter the "brown Buick LeSabre
10 (AVN4805)." The probable cause with respect to this vehicle is discussed at
11 paragraphs 248 to 259.

12 **A black and tan 1979 Mercury Cougar with Washington license**
13 **AIP0343.** Cleophus Shepard drives this vehicle. Hereinafter the "black and tan
14 Mercury Cougar (AIP0343)." The probable cause with respect to this vehicle is
15 discussed at paragraphs 248 to 259.

16 **A 2017 black Ford Explorer with Washington temporary license**
17 **A3421042 listing Vehicle Identification Number (VIN)**
18 **1FM5K8GT2HGE00414.** Luis Perez-Cruz drives this vehicle. Hereinafter the
19 "black Ford Explorer (A3421042)." The probable cause with respect to this
20 vehicle is discussed at paragraphs 260 to 278.

21 **A brown 2001 GMC Yukon with Washington license BAE9909.** Tiffany
22 Younger drives this vehicle. Hereinafter the "brown GMC Yukon (BAE9909)."
23 The probable cause with respect to this vehicle is discussed at paragraphs 279 to
24 285.

25 **A gray 2009 Chevrolet Impala with Washington license BBK1418.**
26 Lamont Reynolds drives this vehicle. Hereinafter the "gray Chevrolet Impala
27 (BBK1418)." The probable cause with respect to this vehicle is discussed at
28 paragraphs 168, 286-87, 307, 313, and 320.

1 **A black 2007 Cadillac Escalade with Washington license (BHY8148).**

2 Charles Cheatham drives this vehicle. Hereinafter the "black Cadillac Escalade
3 (BHY8148)." The probable cause with respect to this vehicle is discussed at
4 paragraphs 108, 117, 135, 138, 159, 161, 165, 255, 288 to 321, 656, 668, and 680.

5 **A black 2000 Chevrolet Tahoe with Washington license AUA9717.**

6 Waunika Walker drives this vehicle. Hereinafter the "black Chevrolet Tahoe
7 (AUA9717)." The probable cause with respect to this vehicle is discussed at
8 paragraphs 330 to 342.

9 **A green 1996 Honda Accord with Washington license BJC9550.**

10 Rasheed Echols drives this vehicle. Hereinafter the "green Honda Accord
11 (BJC9550)." The probable cause with respect to this vehicle is discussed at
12 paragraphs 343 to 361.

13 **A black 2018 GMC Acadia with Washington license BIX8744.** Stacy

14 Humphrey drives this vehicle. Hereinafter the "black GMC Acadia (BIX8744)."
15 The probable cause with respect to this vehicle is discussed at paragraphs 362 to
16 371.

17 **A red 2001 Kia Soul with Washington license AWE7583.** Nonis Clayton

18 drives this vehicle. Hereinafter the "red Kia Soul (AWE7583)." The probable
19 cause with respect to this vehicle is discussed at paragraphs 382 to 396.

20 **A blue 2012 Audi Q5 with Washington license ARL6025.** Chryar

21 Mitchell drives this vehicle. Hereinafter the "blue Audi Q5 (ARL6025)." The
22 probable cause with respect to this vehicle is discussed at paragraphs 432 to 442.

23 **A gray 2006 Volkswagen Passat with Washington license BHK7700.**

24 Chryar Mitchell drives this vehicle. Hereinafter the "gray Volkswagen Passat
25 (BHK7700)." The probable cause with respect to this vehicle is discussed at
26 paragraphs 432 to 442.

27 **A black 2007 Chevy Tahoe with Washington license BKA4496.** Chryar

28 Mitchell drives this vehicle. Hereinafter the "black Chevy Tahoe (BKA4496)."

1 The probable cause with respect to this vehicle is discussed at paragraphs 432 to
2 442.

3 **A white 2004 Honda Odyssey with Florida license ECIT67.** Danavian
4 Hunter drives this vehicle. Hereinafter the "white Honda Odyssey (Florida
5 ECIT67)." The probable cause with respect to this vehicle is discussed at
6 paragraphs 443 to 473 and 609.

7 **A silver 2006 Honda Odyssey with Florida license 7151IA.** Danavian
8 Hunter drives this vehicle. Hereinafter the "silver Honda Odyssey (Florida
9 7151IA)." The probable cause with respect to this vehicle is discussed at
10 paragraphs 443 to 473, 614, and 616,

11 **A gray 2001 Lexus ES with Washington license BHJ4065.** Danavian
12 Hunter drives this vehicle. Hereinafter the "gray Lexus ES (BHJ4065)." The
13 probable cause with respect to this vehicle is discussed at paragraphs 416, 443 to
14 473, and 561 to 563.

15 **A blue 2004 Chevrolet Tahoe with Washington license BFR8025.**
16 Walter Robinson drives this vehicle. Hereinafter the "blue Chevrolet Tahoe
17 (BFR8025)." The probable cause with respect to this vehicle is discussed at
18 paragraphs 475 to 483.

19 **A maroon 1992 Honda Accord with Washington license BIF4770.**
20 Joseph Wilson drives this vehicle. Hereinafter the "maroon Honda Accord
21 (BIF4770)." The probable cause with respect to this vehicle is discussed at
22 paragraphs 484 to 494.

23 **A white 2015 Hyundai Sonata with Washington license AVX0558.**
24 James Mayers drives this vehicle. Hereinafter the "white Hyundai Sonata
25 AVX0558." The probable cause with respect to this vehicle is discussed at
26 paragraphs 501 to 518.

27 **A red 2015 Chevrolet Camaro with Washington license AVF3570.**
28 James Mayers drives this vehicle. Hereinafter the "red Chevrolet Camaro

1 (AVF3570)." The probable cause with respect to this vehicle is discussed at
2 paragraphs 501 to 518.

3 **A black 2008 Dodge Charger with Washington license APK4646.**

4 Leonard Haywood drives this vehicle. Hereinafter the "black Dodge Charger
5 (APK4646)." The probable cause with respect to this vehicle is discussed at
6 paragraphs 519 to 529.

7 **A black 2011 Chevy Camaro with Washington license AZW6725.**

8 Leonard Haywood owns this vehicle. Hereinafter the "black Chevy Camaro
9 (AZW6725)." The probable cause with respect to this vehicle is discussed at
10 paragraphs 519 to 529.

11 **A maroon 2005 Chevrolet Impala with Washington license BHX9836.**

12 Bobby Beasley drives this vehicle. Hereinafter the "maroon Chevrolet Impala
13 (BHX9836)." The probable cause with respect to this vehicle is discussed at
14 paragraphs 530 to 536 and 554.

15 **A blue 1997 Buick Park Avenue with Washington license AWX3675.**

16 Bobby Beasley owns this vehicle. Hereinafter the "blue Buick Park Avenue
17 (AWX3675)." The probable cause with respect to this vehicle is discussed at
18 paragraphs 530 to 536.

19 **A gray 1997 Chevrolet Tahoe with Washington license AVP0293.**

20 Bobby Beasley drives this vehicle. Hereinafter the "gray Chevrolet Tahoe
21 (AVP0293)." The probable cause with respect to this vehicle is discussed at
22 paragraphs 530 to 536.

23 **A blue 2007 Chevrolet HHR with Washington license AXP3487.** Dennis

24 Herold drives this vehicle. Hereinafter the "blue Chevrolet HHR (AXP3487)." The
25 probable cause with respect to this vehicle is discussed at paragraphs 549 to 565.

26 **A white 2015 Kia Sorento with Washington license ATS1433.**

27 Christopher Clay drives this vehicle. Hereinafter the "white Kia Sorento
28

1 (ATS1433)." The probable cause with respect to this vehicle is discussed at
2 paragraphs 580 to 607.

3 **A white 2008 Ford F-150 with Washington license B88559Y.**

4 Christopher Clay drives this vehicle. Hereinafter the "white Ford F-150
5 (B88559Y)." The probable cause with respect to this vehicle is discussed at
6 paragraphs 580 to 607.

7 **A black 2004 Audi wagon with Washington license BGJ0165.** Railen

8 Wheeler drives this vehicle. Hereinafter the "black Audi Wagon (BGJ0165)." The
9 probable cause with respect to this vehicle is discussed at paragraphs 593 and 608
10 to 616.

11 **A black 2011 BMW 535 with Washington license AYW1075.** Railen

12 Wheeler drives this vehicle. Hereinafter the "black BMW 535 (AYW1075)." The
13 probable cause with respect to this vehicle is discussed at paragraphs 503, 523,
14 and 554.

15 **A gray 1999 GMC Yukon with Washington license BIH2904.** Railen

16 Wheeler drives this vehicle. Hereinafter the "gray GMC Yukon (BIH2904)." The
17 probable cause with respect to this vehicle is discussed at paragraphs 510 to 511
18 and 608 to 616.

19 **A silver 2002 Honda Accord with Washington license BGH9778.**

20 Patrick Williams drives this vehicle. Hereinafter the "silver Honda Accord
21 (BGH9778)." The probable cause with respect to this vehicle is discussed at
22 paragraphs 621 to 632.

23 **A black 2017 Honda Pilot with Washington license BJK4798.** Patrick

24 Williams owns this vehicle. Hereinafter the "black Honda Pilot (BJK4798)." The
25 probable cause with respect to this vehicle is discussed at paragraphs 621 to 632.

26 **A gray 2011 Chevrolet Silverado with Washington license C41908L.**

27 Johnny Davis drives this vehicle. Hereinafter the "gray Chevrolet Silverado
28

1 (C41908L)." The probable cause with respect to this vehicle is discussed at
2 paragraphs 633 to 647,

3 **A black 2007 Toyota Camry with Washington license BHY9139.** Ernie
4 Davis drives this vehicle. Hereinafter the "black Toyota Camry (BHY9139)." The
5 probable cause with respect to this vehicle is discussed at paragraphs 648 to 661
6 and 680.

7 **A black 2009 Mercedes coupe with Washington license BBY1137.** Jihad
8 Zeigler drives this vehicle. Hereinafter the "black Mercedes Coupe (BBY1137)." The
9 probable cause with respect to this vehicle is discussed at paragraphs 673 to
10 680.

11 **A black 2002 Dodge Durango with British Columbia license FN508A.**
12 Edward Locke drives this vehicle. This vehicle previously had British Columbia
13 license DW362B listing the same registered owner. For ease of reading this
14 vehicle will be referred to as the "black Dodge Durango (British Columbia
15 FN508A)." The probable cause with respect to this vehicle is discussed at
16 paragraphs 685 to 700, 708, and 710.

17 **A blue 2012 BMW 750 with Washington license BBJ1643.** Lovell
18 Brown drives this vehicle. Hereinafter the "blue BMW 750 (BBJ1643)." The
19 probable cause with respect to this vehicle is discussed at paragraphs 701 to 714.

20 **A blue 2003 Jaguar with Washington license AZJ2575.** Crystal Barquet
21 drives this vehicle. Hereinafter the "blue Jaguar (AZJ2575)." The probable cause
22 with respect to this vehicle is discussed at paragraphs 715 to 731.

23 **A silver 2010 Mercedes S550 with Washington license BDT6285.** Jevon
24 Gipson owns this vehicle. Hereinafter the "silver Mercedes S550 (BDT6285)." The
25 probable cause with respect to this vehicle is discussed at paragraphs 732 to
26 739.

27 **A black 2013 Hyundai Azera with Washington license BIH2915.** Jevon
28 Gipson drives this vehicle. Hereinafter the "black Hyundai Azera (BIH2915)."

1 The probable cause with respect to this vehicle is discussed at paragraphs 732 to
2 739.

3 **A black 2007 Lexus LS with Washington license BCH9981.** Robert
4 Otero drives this vehicle. Hereinafter the "black Lexus LS (BCH9981)." The
5 probable cause with respect to this vehicle is discussed at paragraphs 740 to 757.

6 **A black 2015 Acura TLX with Washington license BHX7569.** Robert
7 Otero drives this vehicle. Hereinafter the "black Acura TLX (BHX7569)." The
8 probable cause with respect to this vehicle is discussed at paragraphs 740 to 757.

9 **A gold 1995 Lexus LS with Washington license BHY4179.** Tabid
10 Mohamed drives this vehicle. Hereinafter the "gold Lexus LS (BHY4179)." The
11 probable cause with respect to this vehicle is discussed at paragraphs 758 to 771.

12 **A black 2009 BMW 750 with Washington license BCG6090.** Tabid
13 Mohamed drives this vehicle. Hereinafter the "black BMW 750 (BCG6090)." The
14 probable cause with respect to this vehicle is discussed at paragraphs 758 to 771.

15 **A white 2000 GMC Savana with Washington license 058ZAD.** Jon
16 Williams drives this vehicle. Hereinafter the "white GMC Savana (058ZAD)."
17 The probable cause with respect to this vehicle is discussed at paragraphs 772 to
18 787.

19 **A green 2002 Honda Civic with Washington license BGK1218.** Michael
20 Morgan drives this vehicle. Hereinafter the "green Honda Civic (BGK1218)." The
21 probable cause with respect to this vehicle is discussed at paragraphs 612 and 637.

22 **A silver 2006 Honda Odyssey with Washington license AUJ9144.**
23 Michael Morgan owns and Kimberly Guadalupe drives this vehicle. Hereinafter
24 the "silver Honda Odyssey AUJ9144." The probable cause with respect to this
25 vehicle is discussed at paragraphs 808 to 813 and 826.

26 **A gray 2002 BMW X5 with Washington license BGE2269.** Anthony Dao
27 drives this vehicle. Hereinafter the "gray BMW X5 (BGE2269)." The probable
28 cause with respect to this vehicle is discussed at paragraphs 788 to 807.

1 **A black 2005 Mercedes 320 with Washington license 177XPM.** Anthony
2 Dao drives this vehicle. Hereinafter the "black Mercedes 321 (177XPM)." The
3 probable cause with respect to this vehicle is discussed at paragraphs 788 to 807.

4 **SOURCES OF INFORMATION**

5 10. I have obtained the facts set forth in this Affidavit through my personal
6 participation in the investigation described below; from my review of intercepted calls to
7 date; from oral and written reports of other law enforcement officers; from records,
8 documents, and other evidence obtained during this investigation; and from confidential
9 sources who are associated with and knowledgeable about the subjects of this
10 investigation. I have obtained and read official reports prepared by various law
11 enforcement officers participating in this and other investigations. I have not included
12 every fact known concerning this investigation. I have set forth the facts that I believe are
13 necessary for a fair determination of probable cause for the requested search warrants.
14 During this investigation, investigators have made use of numerous investigative
15 techniques, including but not limited to making controlled purchases of controlled
16 substances; executing search warrants; seizing drugs and drug proceeds; conducting
17 video and physical surveillance; and conducting a financial investigation.

18 11. When I refer to vehicle ownership or driver's licenses in this Affidavit, I
19 have reviewed the relevant state vehicle records from the Washington State Department
20 of Licensing, or the equivalent agency in other states or countries. When I refer to the
21 criminal history of a subject, I have read the available criminal history from state or
22 federal agencies. When I refer to telephone subscription records, I have read the
23 subscriber records obtained from the telephone company by administrative subpoena or
24 court order, or I have obtained the information from other law enforcement officers
25 familiar with this investigation. When I refer to telephone toll records, I have received the
26 information from the telephone company pursuant to an administrative subpoena or
27 court-authorized pen registers. When I refer to customer information regarding utilities,
28 power, or vehicle rentals, I obtained this information pursuant an administrative

1 subpoena. When I refer to GPS data for telephones, that data was obtained pursuant to
2 court authorization, granted in the Western District of Washington.

3 12. During the course of this investigation, we have obtained authorization in
4 the Western District of Washington to intercept wire communication over multiple target
5 telephones, including but not limited to the telephones summarized in the following table:

Target Telephone	User	Date of Order	Date Ended
TT1 – 206-890-5711	Michael Morgan	September 6, 2017	October 6, 2017
TT4 – 206-474-8971	Joseph Wilson	September 6, 2017	October 6, 2017
TT12 – 206-557-2885	Crystal Barquet	November 3, 2017	November 16, 2017
TT15 – 253-224-9829	Charles Cheatham	November 3, 2017	December 2, 2017
TT17 – 850-361-7470 ³	Danavian Hunter	November 3, 2017	December 6, 2017
		February 12, 2018	March 14, 2018
TT18 – 206-330-4359	Edward Locke	November 3, 2017	December 2, 2017
TT19 – 206-972-8851	Anthony Dao	November 3, 2017	November 16, 2017
TT21 – 253-254-2227	Calvin Thomas	November 3, 2017	December 3, 2017
TT3 – 206-501-5395	Johnny Davis	February 12, 2018	March 14, 2018
TT40 – 206-618-7657	Michael Morgan	February 12, 2018	March 14, 2018
TT6 – 425-529-7868	Railen Wheeler	February 12, 2018	March 14, 2018
TT41 – 206-619-2805	Railen Wheeler	February 12, 2018	March 14, 2018
TT24 – 323-408-4784	Michael Davis	February 12, 2018	March 14, 2018
TT46 – 213-833-8533	Charles Cheatham	February 12, 2018	March 14, 2018

19 13. During this investigation, investigators intercepted thousands of drug-
20 related conversations and text messages. In this Affidavit, I discuss some of these
21 intercepted calls and text messages. With the exception of TT19,⁴ communications
22 occurred in English. A combination of agents, task force officers, linguists, and
23 professional monitors have listened to these calls and summarized their content. I have
24 relied upon the written summaries (line sheets and transcripts) prepared by the monitors
25

26 ³ On November 7, 2017, I submitted an Amended Affidavit seeking authorization to intercept the same group of
27 Target Telephones. The only change between my original and amended affidavits was to correct a mistake in the
28 IMEI number for TT17. No other change was made to the application, affidavit, and order. The Honorable Richard
A. Jones signed the Amended Intercept Order that same day.

⁴ Some calls occurred in Vietnamese.

1 for the description of the calls referenced below, and I have also personally listened to the
2 calls. I know through training and experience, including experience with this
3 investigation, that individuals involved in the distribution of controlled substances and
4 other criminal activity often use coded communications when referring to their illegal
5 activity. I have used this training and experience, as well as the training and experience of
6 other experienced law enforcement officers familiar with this investigation who have
7 reviewed these summaries and have listened to the calls, to explain what I believe to be
8 an accurate interpretation for these coded communications, which are included in
9 parentheses in this Affidavit.

10 14. In this Affidavit, I discuss some of the pertinent portions of intercepted
11 calls and generally do not include the entire intercepted conversation. I indicate where
12 possible the parties who were intercepted on the call. In so doing, I often rely on voice
13 recognition/comparison by myself, other agents, and/or the monitors. For example, if we
14 have identified an individual as the user of a particular phone (through use of a ruse call,
15 surveillance/GPS, etc.), and that person starts using a different phone, we will typically
16 recognize the voice of that person when using the new phone.

17 15. Some examples of coded terms used by members of the Michael Morgan
18 DTO include "hard" (crack cocaine); "soft" (powder cocaine); "black" or "black top"
19 (heroin); "fire" (often marijuana, but also used to describe high potency of cocaine or
20 heroin); and "blues" (oxycodone or other unlawfully diverted pharmaceutical). Some
21 terms to indicate quantity have been "nino" (nine ounces of cocaine); "baby" or "four and
22 a baby" (four and a half ounces of cocaine); "half" (half unit); and "ball" (ounce or
23 eightball referring to one-eighth of an ounce). Terms to indicate currency include "rack"
24 (\$1,000) and "band" (\$1,000). Drug customers are often referred to as "jug" or "joog."

25 16. DTO members also use plays on common words. For example, a play on
26 "soft" is "szoft." Also a play "half" is "heazy." DTO members also use the word "need"
27 to convey the desire to be supplied with drugs. DTO members often say, "I need to see
28 you," "I need you," "need to get on" to arrange a drug transaction. Oftentimes when this

1 is said, no other discussion occurs regarding amounts or prices. Based upon my training
2 and experience, I believe the expected transaction is already known by both parties
3 because of the length of time and frequency the parties have been dealing with each
4 other.

5 17. Context is also important in interpreting coded language; for example,
6 when someone says "one" is selling for "twenty-four five," that indicates that the speaker
7 is discussing a kilogram of cocaine for \$24,500. Based on my training and experience, I
8 am familiar with price ranges of drugs in the Seattle area, which depends on quality; I
9 know that a kilogram of cocaine can cost anywhere from \$23,000 to \$29,000 per
10 kilogram.

11 18. In this Affidavit, I am seeking authority to search locations and vehicles
12 associated with drug distributors.⁵ To give perspective as to the amount of drugs being
13 distributed, and because most of the distribution in this investigation centered on cocaine,
14 I will draw the distinction as to user amounts and distributor amounts of this drug based
15 upon my training, experience, and knowledge of this investigation.

16 19. Crack cocaine is often sold on the street in the open air drug markets of the
17 Seattle area. Street dealers often sell \$10 or \$20 rocks or wafers of crack cocaine to users.
18 These rocks are often .1 or .2 grams of cocaine each. User amounts of cocaine also
19 includes "teeners" (1/16 of an ounce or 1.75 grams), single grams, and "eight balls" (1/8
20 of an ounce or 3.5 grams). Street dealers themselves may be supplied quarter-ounce (7
21 grams), half-ounce, and ounce (28 grams) quantities or more. Currently, when purchasing
22 an ounce of cocaine, the price is around \$1000, give or take a couple of hundred dollars.
23 Often those purchasing multiple ounces or more of cocaine are distributing to other
24 distributors. Larger amounts of cocaine and associated prices are discussed throughout
25 this Affidavit.

26
27
28 ⁵ The exception is a vehicle for Dennis Herold, whose section is included to provide context. Herold may be a user
of unlawfully diverted opioids and not necessarily a distributor.

SUMMARY OF THE INVESTIGATION

20. Based upon confidential source information, investigators identified Michael Morgan as a multiple-kilogram cocaine source of supply. Information provided by confidential sources, the use of traditional investigative techniques, and the use of wiretaps have led to the identification of numerous individuals suspected to be involved with the drug trafficking and money laundering activities of Michael Morgan. Investigators refer to this network of suspected drug traffickers as the Michael Morgan Drug Trafficking Organization (DTO).

21. Many of the target subjects and their associates have affiliation with Seattle-area gangs, predominantly those originating from the Central District neighborhood of Seattle. These gangs include, but are not limited to, Union Street Black Gangster Disciples (BGD), Deuce 8 BGD, and other local Crip and Blood gangs. Because of these associations, investigators believe that the Michael Morgan DTO may be a significant source of supply of drugs being distributed by these gangs. Many involved with these gangs have been investigated for crimes ranging from street-level narcotics to robbery, shootings, and murder. Many target subjects and associates have long-standing relationships with others engaged in criminal activity. Many of these relationships span decades.

CONTROLLED PURCHASES FROM THE DTO

22. During the course of this investigation, investigators used confidential sources to conduct controlled purchases from Michael Morgan, Crystal Barquet, and Joseph Wilson.

///

///

Controlled purchase of cocaine from Michael Morgan in 2014

23. In October 2014, CS1⁶ informed investigators that Michael Morgan, also known to CS1 as "Dose," sold large quantities of cocaine in the Seattle area. Based on this information, investigators had CS1 conduct controlled purchases⁷ from Morgan.

24. In October and November 2014, CS1 made controlled purchases of cocaine from Michael Morgan. During the first controlled purchase on October 28, 2014, CS1 purchased approximately 7.8 grams of crack cocaine for \$300. This deal was arranged over the telephone with Morgan using 206-451-9034.

25. During the second controlled purchase on November 13, 2014, CS1 purchased one ounce of cocaine from Morgan for \$1,000. This deal was also arranged over the telephone with Morgan using 206-451-9034. After the purchase, CS1 informed investigators that Morgan had several additional ounces of cocaine in a bag in the driver's side door panel of his vehicle. Calls between CS1 and Morgan were not recorded.

26. Investigators followed Morgan when he departed. Morgan traveled to a residence on South Roxbury Street in Seattle where he parked in the driveway and went inside. Five minutes later, investigators saw Morgan exit the residence and depart. Investigators followed Morgan to a nearby residence on 57th Avenue South in Seattle.

27. Later, Morgan traveled to the Great American Casino in Tukwila. Morgan parked directly next to one of the surveillance vehicles. Morgan got out of his car and knocked on the front passenger window of the surveillance vehicle. Morgan asked the plainclothes detectives why they were following him.

⁶ CS1 is a paid informant. CS1 has provided credible and reliable information, which has been corroborated, both during other investigations and during this investigation. CS1 has an extensive criminal history including numerous felony and misdemeanor convictions. These include robbery, assault, witness tampering, domestic violence court order violations, and offenses relating to driving on a suspended or revoked license. CS1 has several convictions for unlawful possession of firearms and several convictions for obstructing a law enforcement officer.

⁷ During the controlled purchases discussed in this Affidavit, investigators searched the CS prior to the purchase and ensured the CS (and/or vehicle) was free of currency and contraband. Investigators provided the money used to purchase the controlled substances. Investigators maintained surveillance of the CS during the controlled purchase. Upon returning to investigators after the controlled purchase, the CS turned over any contraband, drugs, and/or unspent funds, and investigators again searched the CS to ensure the CS was free of additional currency or contraband.

28. After the compromised surveillance, investigators had CS1 attempt to contact Morgan by telephone on numerous occasions. Morgan would not answer any of the calls. According to the Washington Department of Licensing, about a week later, Morgan sold the silver Honda Accord. Investigators believe Morgan stopped accepting calls from the informant and sold his car because of the compromised surveillance.

July 2017: Controlled purchase of cocaine from Joseph Wilson

29. CS2⁸ informed investigators that Morgan was the largest cocaine dealer CS2 was familiar with. CS2 had been in contact with Wilson on ***TT4***⁹ prior to his/her cooperation with law enforcement. CS2 began cooperating with investigators in 2016. According to CS2, Ernie Davis informed him/her that Morgan supplies Wilson with cocaine.

30. On July 25, 2017, investigators directed CS2 to provide Joseph Wilson with CS8's phone number and informed Wilson that CS8 was looking to purchase an ounce of cocaine.

31. On July 26, 2017, CS8¹⁰ received an incoming call from ***TT4***. Investigators observed this number calling CS8's phone as the call came in. Investigators recorded the call between Wilson and CS8. During the call, CS8 asked for "two whole ones" (two

⁸ CS2 became a confidential source after an arrest on drug charges. CS2 was not charged after working for law enforcement. CS2 has since worked as a paid informant. CS2 has felony convictions for possession of a controlled substance, possession of a firearm, and residential burglary. CS2 also has gross misdemeanor or misdemeanor convictions for identity theft, false reporting an emergency, driving offenses and assault. Information provided by CS2 has been found to be credible and has been corroborated by investigators throughout this investigation. CS2 has provided corroborated information such as phone numbers, social media contact information, addresses, and license plates to investigators during this investigation. CS2 has also identified Morgan's associations with Ernie Davis, Johnny Davis, Joseph Wilson, Larry Holloway, and Crystal Barquet. These associations have been confirmed during surveillance operations in this investigation.

⁹ Telephone numbers highlighted in bold and italics were the phone numbers subject to wire and electronic intercept.

¹⁰ CS8 is working for consideration on state drug and firearm charges. CS8 has numerous convictions, including both felonies and misdemeanors. With the exception of driving offense convictions and a misdemeanor marijuana conviction, all of the convictions occurred prior to 2005. These convictions include taking motor vehicles without permission, theft, obstructing a law enforcement officer, and vehicle prowling. Information provided by CS8 has been found to be credible and has been corroborated by investigators throughout this investigation. For example, CS8 has provided information regarding Bobby Beasley, who investigators have seen during physical surveillance with Morgan. This information included Beasley's phone number, license plate, and address, which all have been corroborated by investigators.

1 ounces) of “sinof” (a play on “soft” which is code for powder cocaine). Wilson said he
2 only had the “hinar” (a play on “hard” which is code for crack cocaine). CS8 asked for
3 two “hard” and the two agreed to meet at a Safeway in Renton. Investigators and CS8
4 went to the Safeway.

5 32. Investigators saw Wilson arrive in a blue Charger at the Safeway and park a
6 few rows away from CS8. Wilson walked into Safeway and came back out within a
7 couple of minutes. Wilson got back into his blue Charger and drove closer to CS8.
8 Investigators identified Wilson from his driver’s license photograph. Wilson got out of
9 the blue Charger and got into the front passenger seat of CS8’s vehicle. Within a few
10 minutes, Wilson got out of CS8’s vehicle and departed in the blue Charger.

11 33. Investigators followed CS8 to another location. CS8 turned over a clear
12 plastic bag containing approximately 56.7 grams of crack cocaine (field test positive) and
13 \$500 of unspent funds. CS8 reported that Wilson got into the front passenger seat of
14 CS8’s vehicle without hesitation. Wilson pulled the crack cocaine from his pants pocket
15 and gave it to CS8. CS8 stated that he/she gave Wilson \$1,900 after checking the crack
16 cocaine. CS8 said Wilson did not count the money at the time and they talked about
17 future deals. CS8 said Wilson told CS8 to call him for additional cocaine in the future.

18 ***September 2017: Controlled purchase of a “baby” (4½ ounces of cocaine) from***
19 ***Joseph Wilson and Calvin Thomas during interception of TT4***

20 34. On September 19, 2017, CS8 sent a text message to **TT4**, used by Joseph
21 Wilson, reading, “Bro do you remember me net you at the safeway in renton” (referring
22 to the controlled purchase discussed above). **TT4** responded, “Oh ok wassup bro didnt
23 know who this was lol.” CS8 responded, “Lol” “I’m bout to head to po real quick I’ll be
24 back later tonight like 3 but that’s to late can I get on with 4nbaby” (four and a half
25 ounces of cocaine) “in the am.” **TT4** did not respond.

26 35. The following day on September 20, 2017, CS8 sent a text message
27 (session 3490) to **TT4** reading, “Can I get on.” **TT4** responded, “Hit u when I’m off
28

1 work." Later that evening, CS8 sent another text message trying to contact Wilson on
2 **TT4** which went unanswered.

3 36. The following day, on September 21, 2017, CS8 sent two additional text
4 messages to attempt to contact Wilson on **TT4** that also went unanswered. After these
5 unanswered text messages, **TT4** (Wilson) received a call (session 4133) from **TT21**
6 (Calvin Thomas, identification described below) that Wilson did not answer. Wilson then
7 called **TT21** back using **TT4** (session 4148). Thomas answered **TT21** and told Wilson "I
8 got a new number I forgot to give it to you." Thomas also told Wilson "somebody had
9 called me from a restricted, man, you know. I don't...when I get a restricted, I have to
10 throw that shit away." Thomas went on to say "I answered, I answered thinking it was
11 mom's, and it was somebody asking for Jon, fuck that, it's time to go." Based on my
12 training and experience, I know that some experienced drug traffickers know that law
13 enforcement will sometimes place ruse calls to suspicious phones in an attempt to
14 identify the user. When the suspect suspects it was a ruse call, the suspect will often drop
15 their phone after receiving such a call. The call described by Thomas was in fact a call
16 placed by law enforcement in this investigation.

17 37. Wilson responded, "Man, motherfucker has been blowing me, man."
18 Based on my training and experience, I believe Wilson interrupted himself from finishing
19 the phrase "blowing me up," and I know this phrase refers to someone making numerous
20 calls or text messages to Wilson. Thomas explained that he got rid of his previous phone
21 and forgot to provide his number to Wilson. Wilson continued, saying, "Motherfuckers
22 have been blowing me like a motherfucker too, man." Wilson stated, "I think he wanted
23 few" and asked "what was the number again?" Thomas said, "Eight fifty" (\$850 an
24 ounce). Wilson later said, "Let me call my guy real quick."

25 38. Approximately five minutes later, **TT4** made two unanswered calls to CS8
26 (sessions 4158 and 4161). CS8 then received text messages from **TT4** reading, "Call me
27 just called u I was at work" and "Let me know bro." CS8 responded, "Ok I'm with my
28 young one can I get on in the am or afternoon." **TT4** responded, "Yup" "What you

1 looking like so I can bring it to work with me.” CS8 responded, “4 in a baby what’s a
2 good time.” CS8 was referring to four and a half ounces of cocaine. **TT4** responded,
3 “Wya” (where you at). “Wrong person my bad but anytime in the am.”

4 39. September 22, 2017, CS8 sent text messages to **TT4**, “Wya” “Bro where do
5 I go.” Approximately one minute later, Wilson using **TT4** called Thomas on **TT21**
6 (session 4425). Wilson said that his “dude” (CS8) “hit” Wilson and “want to get that
7 baby” (half of a quarter kilogram of cocaine which equates to four and half ounces).
8 Thomas said he was “ready.” Wilson said he was at work.

9 40. **TT4** then made an outgoing call (sessions 4427 and 4428) to CS8. Wilson
10 said he was at work in Kenmore and asked where CS8 was coming from. CS8 said he/she
11 was in Auburn. Wilson said that he was going to have his “girl drop that shit off to me”
12 and told CS8 to head towards Kenmore. Wilson said he would send the address. CS8 then
13 received a text message from **TT4** reading, “7204 n.e Bothell way.” This is the address to
14 the Kenmore Jiffy Lube.

15 41. **TT4** then called **TT21** (session 4429). Wilson asked for Thomas to come to
16 Wilson, gave the address “7204 Northeast Bothell Way,” and provided some directions.
17 Thomas said he was on the way. During session 4440, **TT4** sent **TT21** a text message
18 reading, “7204 n.e Bothell way Kenmore wa.”

19 42. Later, **TT21** called **TT4** (session 4447). Thomas said, “I’m outside.”
20 Contemporaneous with this call, investigators observed a green Ford F150 pickup truck
21 pull into the Jiffy Lube parking lot and park. The green F150 was registered to Calvin
22 Thomas. Investigators observed Wilson, wearing a Jiffy Lube uniform, get into the front
23 passenger seat of the pickup.

24 43. **TT4** then called CS8 (session 4450). CS8 informed Wilson that CS8 was on
25 the freeway at the end of Highway 167 near Interstate 405. Wilson then said, “He just
26 right there, that’s going to take him another like twenty or thirty minutes.” CS8 said
27 he/she was coming right now.
28

1 44. Wilson then got out of the green F150 and walked back into Jiffy Lube.
 2 The green F150 then drove into one of the service bays. Investigators could see that
 3 Thomas was waiting inside the Jiffy Lube and identified him from his Washington
 4 driver's license photograph. Investigators later observed the green F150 pull out of the
 5 service bay and park in the Jiffy Lube parking lot. Thomas stayed inside the vehicle.

6 45. CS8 called **TT4** (session 4461) and asked if he/she was supposed to pull in
 7 after "O'Reilly's" (an auto parts shop located near Jiffy Lube). Wilson said, "Yup." CS8
 8 arrived at Jiffy Lube and parked next to the green F150. Investigators observed Wilson
 9 walk out of the Jiffy Lube and get into the front passenger seat of CS8's vehicle. Wilson
 10 then got out of the vehicle and walked back into Jiffy Lube. CS8 then drove out of the
 11 area, followed by handling investigators to a neutral location.

12 46. Investigators observed Wilson come back out of the Jiffy Lube and get into
 13 the front passenger seat of the green F150. Wilson then got back out and returned to Jiffy
 14 Lube. Thomas then drove away in the green F150.

15 47. At the neutral location, CS8 turned over approximately four and a half
 16 ounces of cocaine (field-test positive) and \$280 of unspent funds. Investigators searched
 17 CS8 and his/her vehicle, finding both to be free of currency and contraband. CS8 paid
 18 \$4,720 for the drugs.

19 ***Controlled purchase of cocaine from Crystal Barquet***

20 48. On October 6, 2017, investigators directed CS9¹¹ to purchase cocaine from
 21 Crystal Barquet (identification discussed below). Investigators instructed CS9 to make
 22 contact with Barquet on **TT12**. At 4:15 p.m., CS9 made two unanswered calls to **TT12**
 23 and then sent a text message¹² to **TT12** which read, "Hit me sis." **TT12** immediately
 24

25 ¹¹ CS9 is seeking consideration on state gun and drugs charges. CS9 has also been provided a small amount of
 26 money for gas and food after the controlled purchase. CS9 has felony convictions for drugs, assault, and rape
 27 (occurring over two decades ago). CS9 is believed to be credible after providing corroborated information about the
 Morgan DTO. For example, CS9 identified Barquet both by her true name and moniker, informed investigators that
 she is supplied by Michael Morgan, and identified Morgan both by his true name and moniker.

28 ¹² Investigators verified all telephonic contact between CS9 and TT12 from the court-authorized pen register and
 trap and trace device for TT12.

1 returned a phone call. During this recorded call, CS9 and Barquet spoke. CS9 stated
2 he/she wanted to meet at 7:30 p.m. Barquet said, "Ok. Just hit me." Barquet then started
3 to have a social conversation. CS9 asked, "What you going to tax me for two of them o's
4 man of the soft or the hard?" (asking for the price of two ounces of powder cocaine or
5 crack cocaine). Barquet interrupted with an upset voice, "We can talk later when you see
6 me."

7 49. At 7:26 p.m., CS9 called **TT12**. During the call, CS9 asked, "Dillinger you
8 ready?" Barquet responded, "I'm at the house." CS9 said, "I don't know where that's at."
9 The call unexpectedly disconnected. CS9 immediately called **TT12** back. During the call,
10 Barquet asked, "What's good." CS9 said, "Trying to get on real quick, man." Barquet
11 said that she was "at the house" and told CS9 to come to "Applebee's in Factoria." CS9
12 asked if there was any way for Barquet to meet at CS9's location. Barquet said, "I ain't
13 drivin'." CS9 said, "I will just have to come that way and we will put it together."

14 50. Investigators outfitted CS9 with a recording and monitoring device and led
15 CS9 to the Applebee's in the Factoria neighborhood of Bellevue, Washington. Upon
16 arrival, CS9 made outgoing calls to **TT12**. At 8:11 p.m., **TT12** answered. Investigators
17 could hear the conversation between CS9 and Barquet on the recording device. CS9 said,
18 "I'm right here" and asked Barquet to come to his/her location. Barquet said, "I'm
19 walking. I'm not driving." Barquet asked, "Who you with." CS9 said he/she was alone.
20 Barquet said, "Oh well just come to my house." CS9 and Barquet negotiated on whether
21 Barquet was going to come to CS9's location or vice versa. Ultimately, Barquet provided
22 directions to her apartment. CS9 asked, "Can you just text me the address so I can GPS
23 it?" Barquet responded, "I don't text my address" and continued to provide directions.
24 Barquet interrupted herself and said, "I just saying I don't text someone my address for
25 something like that on the phone." Barquet continued providing directions.

26 51. Based upon my training and experience, I believe that Barquet, using **TT12**,
27 understood that CS9 was contacting her to purchase cocaine. I believe that Barquet did
28

1 not want to discuss the specifics about the drug deal over the telephone and directed CS9
2 to her residence so they could discuss the specifics of the transaction in person.

3 52. CS9 drove to Barquet's apartment complex, escorted by investigators. CS9
4 parked in the apartment parking lot. CS9 called **TT12** and told Barquet that he/she arrived
5 and was parked. Barquet said she would come out and asked what kind of car CS9 was
6 in. CS9 described his/her vehicle.

7 53. Investigators observed a female dressed in a bathrobe fitting the physical
8 description of Barquet come from Barquet's apartment (**13045 Southeast 26th Street,**
9 **Apartment B103**, Bellevue, Washington). Because it was dark, investigators could not
10 positively identify Barquet from a driver's license photograph. However, CS9 had
11 previously identified Barquet from her driver's license photograph and confirmed that
12 this drug transaction occurred with Barquet. Investigators saw Barquet go to the driver's
13 door of CS9's vehicle.

14 54. The monitoring device captured the conversation between CS9 and
15 Barquet. CS9 said, "Twenty five hundred with you" (\$2500). Barquet asked, "What?"
16 CS9 said, "Hazard" (crack cocaine). Barquet said, "I don't got no hard right now." CS9
17 said, "Then give me some of the soft. I'll whip that shit up" (provide powder cocaine and
18 CS9 will make it into crack). Barquet said, "I only got like probably like a zip right now"
19 (one ounce). CS9 said, "Let me just cop that." CS9 asked, "What you want for it."
20 Barquet said, "I want twelve" (\$1200). Barquet said, "I will be right back." Based on the
21 recording, I could tell that the female was the same person speaking over **TT12**.

22 55. Investigators observed Barquet return to her apartment. Several minutes
23 later, investigators observed Barquet return to CS9's vehicle. The monitoring device
24 captured their conversation. CS9 asked Barquet, "So when you going to get back on
25 man?" Barquet said, "I'm about to call right now, so probably in a little bit." I believe
26 that Barquet was informing CS9 that she would obtain more cocaine if needed.
27 Investigators saw Barquet return to her apartment and CS9 depart.
28

1 56. Investigators followed CS9 to a neutral location. CS9 turned over
 2 approximately one ounce of cocaine (field-test positive) to investigators and the unspent
 3 money. CS9 paid \$1200 for the ounce of cocaine.

4 57. I would like to note here Barquet's discipline over the telephone in
 5 discussing drug trafficking activities. Barquet would not engage CS9 over the telephone
 6 about amounts or prices of narcotics and stated they would talk in person. Barquet also
 7 refused to text CS9 her address stating that she would not text her address for "something
 8 like that" (matters relating to drug trafficking). As discussed later in this Affidavit,
 9 Morgan shows similar discipline in his use of the telephone.

10 **SEIZURES DURING THE INVESTIGATION**

11 58. Discussed in this section are examples of drug and firearm seizures that
 12 took place during the course of the investigation. Other seizures are also discussed in the
 13 following section.

14 ***Seizure of two handguns from Wesley Armstrong and Shon Brister***

15 59. Investigators intercepted Wesley Armstrong over **TT4** used by Joseph
 16 Wilson using 206-476-3593. Armstrong was, and is, on federal supervision for drugs and
 17 firearm offenses in this District, under Case no. CR11-323RSL. At the time, Armstrong
 18 had an outstanding arrest warrant for violating supervision. Armstrong had several
 19 convictions involving drugs and firearms. After intercepting communications,
 20 investigators believed that Armstrong was in possession of a firearm, under the influence
 21 of drugs, and intending to commit a robbery. Investigators felt compelled to take
 22 Armstrong into custody on his supervised release violation warrant.

23 60. On September 30, 2017, Wilson using **TT4** received a call from Wesley
 24 Armstrong (identification discussed in more detail below) using 206-476-3593 (session
 25 8869). During the call, Armstrong identified himself as "Wes." Armstrong told Wilson,
 26 "I need you" (needed Wilson to supply him with drugs). Wilson said, "I got you." (Please
 27 note this coded exchange. Based on my training, experience, and knowledge of this
 28 investigation, this exchange – "I need you" and "I got you," or similar verbiage, is used

1 by the members of this conspiracy to signify a need for, and willingness to supply,
2 controlled substances. Many calls using this call and response were intercepted during the
3 investigation, and will be discussed elsewhere in this Affidavit.) Armstrong asked, "Tell
4 me this. You have some snow? Some sneezo?" (referring to cocaine). Armstrong asked
5 for a "zip" (ounce). Wilson said he would have to "grab that" (from his source).
6 Armstrong asked, "What's the quality?" Wilson said, "Come on man, this is me man."
7 Wilson said he would speak to Armstrong when he got to Armstrong's location.

8 61. A little over ten minutes later, **TT4** called 206-476-3593 (session 8874).
9 During the call, Armstrong said he was at the "Wallingford Inn" which was north on
10 Highway 99 and told Wilson to Google map it. Wilson asked if Armstrong wanted "two
11 and a heezy" (two and a half ounces of cocaine). Armstrong asked, "What's the ticket?"
12 Wilson said, "Thowow" (\$1000 per ounce).

13 62. About half an hour later, **TT4** called 206-476-3593 (session 8876). During
14 the call, Wilson informed Armstrong that he arrived and was in the back. Armstrong
15 asked if Wilson saw him in the window. Armstrong said to come up the stairs. Armstrong
16 said, "Room 29". Shortly thereafter, **TT4** called 206-476-3593 (session 8878). During the
17 call, Wilson said, "I don't see no twenty-nine." Wilson told Armstrong to come outside.

18 63. On October 1, 2017, investigators went to the Wallingford Inn at 4450
19 Green Lake Way North in Seattle, Washington. Investigators contacted the Inn's
20 management who allowed investigators to review the hotel guest register. Investigators
21 learned that Shon Brister rented room 29 on September 16, 2017, and did not have a
22 scheduled checkout date. Management photocopied the identification cards of those who
23 would occupy the room. Management had photocopies of both Brister's and Armstrong's
24 identification cards. Investigators learned that Armstrong had an outstanding federal
25 supervised release violation arrest warrant for charges relating to drugs.

26 ///

27 ///

1 64. On October 2, 2017, **TT4** exchanged text messages with 206-605-8100
2 (TT2)¹³ (sessions 9599, 9601, 9603, 9605 and 9607). Wilson started the exchange asking
3 if Ernie Davis was familiar with “wes.” Davis responded, “Naw he aint good.” Wilson
4 ended the exchange with “Answer the phone” and then **TT4** called 206-605-8100 (session
5 9609). The call was not answered.

6 65. **TT4** then received a call (session 9610) from 206-387-8820. During the
7 call, Wilson continued the text conversation with this voice call. Wilson said “it felt so
8 weird” and asked if Davis ever got “that weird feeling.” Wilson said “he” (Armstrong)
9 “was acting hella funny.” Wilson continued, saying, “he kept trying trying to get me
10 come in to the room and shit.” Wilson said that Armstrong “was hella weird and shit.”
11 Davis said, “Go with your first mind, man” (your first instincts).

12 66. Wilson said, “He came out, he had-he had like whistle” (gun) “on him and
13 shit, I’m like ‘what are you doing with that?’” Wilson said he thought Armstrong was
14 high. Wilson said that Armstrong “didn’t even got enough for what you’s what talking
15 about getting.” Wilson told Davis that “He didn’t have nowhere near enough Ernie. He
16 was like like fifteen hundred short.”

17 67. Wilson said, “Man, he’s acting weird, man! Every time he always call me I
18 was like, on, you know, something tiny. He just call me, like, all of a sudden. I’m like, ‘I
19 need everything right now, I’m meeting everybody.’ Doing everything.” Wilson said,
20 “Yeah, I don’t know. I don’t know.”

21 68. Based upon my training and experience, I believe that Wilson believed that
22 Armstrong may have been attempting to rob Wilson. Wilson believed that Armstrong
23 attempted to lure Wilson to his hotel room to commit the robbery. During session 8876,
24 investigators could hear a female voice in the background on Wilson’s end of the line,
25 meaning that someone was with Wilson when he arrived at the Wallingford Inn, which
26
27

28 ¹³ Investigators previously obtained a tracking warrant for TT2 and determined through physical surveillance it was used by Ernie Davis.

1 may account for why no robbery was committed. When Wilson spoke of the "whistle,"
2 based upon my training and experience and conversations with other experienced
3 officers, I believe Wilson was referring to a firearm.

4 69. Investigators alerted the U.S. Marshals Service to Armstrong's location to
5 allow them to arrest Armstrong on his existing warrant. We also obtained a delayed
6 notice search warrant for the location and seized two firearms. Armstrong was booked
7 into the King County Jail on a hold for U.S. Marshals. On October 4, 2017, Armstrong
8 made a call to his own phone (206-476-3593) from the King County Jail which was
9 recorded by the correctional facility. The phone was answered by a female. Armstrong
10 asked, "When you went to the bathroom, everything went down right?" The female
11 answered, "Yeah." The two continued to talk about whether the female was going to be
12 kicked out of the room, whether the door was broken, and whether they would be able to
13 get a refund if kicked out. Based upon this conversation, I believe that the female was
14 Brister. During the search, investigators found U.S. currency in the toilet tank. Based
15 upon my training and experience, I believe that Brister flushed any drugs that were in the
16 motel room. According to the Seattle Police Department, Brister was shot and killed in
17 downtown Seattle on November 2, 2017. Two other subjects with her were also shot, and
18 one of them also died.

19 ***December 2017: Seizure of two pounds of methamphetamine and MDMA from***
20 ***Michael Davis, Nakita Cannady, and Alnissia Moore***

21 70. In the late evening of December 14, 2017, investigators went to the Aspen
22 Ridge apartments in Seattle. Tracking data had indicated that **TT24** used by Michael
23 Davis was in this vicinity. There, investigators located a white Cadillac rental vehicle
24 bearing Washington registration 7WML000.

25 71. On December 15, 2017, tracking data for both **TT24** and **TT39**, used by
26 Nakita Cannady, indicated that the phones traveled together from Seattle to Los Angeles.
27 The following day, tracking data for both phones indicated that the phones departed Los
28 Angeles and began traveling eastbound through Nevada, Utah, Colorado, and Nebraska.

1 72. On December 17, 2017, while tracking location data for **TT24** and TT39,
2 investigators located the Cadillac rental vehicle traveling eastbound on Interstate 80 near
3 Iowa City, Iowa. Investigators followed the Cadillac until the vehicle crossed into
4 Illinois, where investigators directed Illinois State Police to stop the Cadillac. The vehicle
5 was speeding just prior to Illinois State Police stopping the vehicle. A drug canine
6 indicated a positive response for narcotic odor emanating from the vehicle, and police
7 searched the vehicle. In the trunk, police located slightly more than two pounds of
8 suspected methamphetamine. Investigators also located approximately 402 pills of
9 suspected MDMA and \$14,000 U.S. currency in the vehicle. Police seized the mentioned
10 items.

11 73. Nakita Cannady was driving the Cadillac. Michael Davis and Alnissia
12 Moore were passengers. The three were informed that the case would be reviewed by
13 prosecutors for any potential charges and all were released. After the three were released,
14 tracking data for **TT24** and TT39 indicated that they traveled to Galesburg, Illinois for a
15 short period of time, and then resumed cross-country travel back to Seattle, Washington.

16 ***January 2018: Seizure of six kilograms of heroin from Nakita Cannady and***
17 ***Nathaniel Wells***

18 74. On January 5, 2018, GPS data for **TT24**, used by Michael Davis, indicated
19 that the phone traveled to Seattle-Tacoma International Airport and then was turned off.
20 Several hours later, GPS data for **TT24** indicated that the phone was in the vicinity of the
21 Los Angeles International Airport (LAX).

22 75. Earlier in the day on January 5, 2018, GPS data for TT39 indicated that the
23 phone began traveling southbound from Western Washington, arriving in Los Angeles
24 near LAX later in the evening on the same date.

25 76. On the morning of January 7, 2018, GPS data for TT39 indicated that the
26 phone began traveling northbound along Interstate 5 from Los Angeles.

27 ///

28 ///

1 77. Also on the morning on January 7, 2018, GPS data for **TT24** indicated that
2 the phone traveled to LAX and appeared to have been turned off. A few hours later, GPS
3 data for **TT24** showed that the phone was in the vicinity of SeaTac Airport.

4 78. Later in the evening on January 7, 2018, investigators spotted a black 2017
5 GMC Acadia rental vehicle bearing Washington license BEM9349 traveling northbound
6 on Interstate 5 just north of Eugene, Oregon after GPS data for TT39 indicated that the
7 phone was in the vicinity. Previously, on January 4, 2018, investigators observed the
8 GMC Acadia at an apartment complex in Auburn, Washington. GPS data had indicated
9 that **TT24** was in this vicinity at the approximate time of the observation.

10 79. Investigators followed the GMC Acadia along I-5 as it entered Western
11 Washington. Just north of Woodland, Washington, pursuant a search warrant authorizing
12 the use of a cell-site simulator to precisely locate TT39, investigators were able to
13 confirm that TT39 was in the GMC Acadia traveling northbound on Interstate 5.

14 80. The GMC Acadia exited the freeway, stopping at Gee Cee's Truck Stop in
15 Toledo, Washington. Investigators observed Nathaniel Wells exit the passenger side of
16 the vehicle. Cannady then got out of the driver's seat. Both went into the store. Cannady
17 and Wells returned to the vehicle. Wells pumped gas into the vehicle. Cannady got into
18 the passenger seat of the vehicle, and Wells got into the driver's seat. Both departed in
19 the GMC Acadia returning to northbound Interstate 5.

20 81. Investigators directed uniformed officers to stop the GMC Acadia, who
21 stopped the vehicle just south of Chehalis, Washington on Interstate 5. A drug canine was
22 applied to the vehicle and provided a positive response for the presence of narcotic odor
23 emanating from the vehicle. Investigators asked for consent to search the vehicle.
24 Cannady stated that the vehicle did not belong to her. Wells gave consent to search.

25 82. Investigators located a red Adidas athletic bag on the third row seat of the
26 GMC Acadia. Investigators found the athletic bag to contain six bundles of suspected
27 heroin and a vacuum-sealed bundle of U.S. currency inside the bag. Investigators seized
28 the bag which was ultimately found to contain six units of suspected heroin believed to

1 be one kilogram each and a vacuum-sealed bundle of U.S. currency containing \$100,000
 2 in fifty and hundred dollar bills. Cannady and Wells denied knowledge of the drugs and
 3 currency located in the vehicle. Both were booked into the Lewis County Jail and
 4 released the following day.

5 **SUBJECT LOCATIONS AND VEHICLES TO BE SEARCHED**

6 83. In this section, I discuss the identification of subjects, examples of their
 7 drug calls and transactions, seizures of contraband, and their associated locations and
 8 vehicles for which search warrants are sought.

9 **Distributors for Charles Cheatham**

10 84. Telephones (*TT15* and *TT46*) used by Charles Cheatham were the subject
 11 of wire and electronic interception. Cheatham's lines were tapped after investigators
 12 learned that he was engaged in drug trafficking with Michael Morgan. Investigators have
 13 found Cheatham to be a significant source of supply for cocaine and heroin in Western
 14 Washington. Several of his distributors are discussed below.

15 **ADAM SMITH**

16 **Associated Locations:** 332 Northeast 117th Street, Seattle, Washington

17 **Associated Vehicles:** no vehicles sought

18 85. Discussed below, Adam Smith was identified as a cocaine distributor who
 19 has been supplied by Cheatham. Investigators have determined that Adam Smith used
 20 206-712-4510 subscribed to "Ace Smith" and 425-429-5848 (prepaid with no
 21 subscriber). Discussed below, investigators seized nine ounces of cocaine and a handgun
 22 from Smith during this investigation.

23 ***November 2017: Seizure of a "nino" (nine ounces of cocaine)***

24 86. On November 27, 2017, Cheatham using *TT15* called Adam Smith using
 25 206-712-4510 (session 3248). During the call Smith said he had "two moves" (two drug
 26 deals set up). Smith told Cheatham that he had "seven dollars" (\$7000) and he needed the
 27 "Nino Rossi" (nine ounces of cocaine). Smith said he would "slide out to the barbershop"
 28 (Nine Thousand Hair Studio located at 3920 South 146th Street Suite B, Tukwila,

1 Washington). Cheatham asked, "Mine?" Smith affirmed. Cheatham said he would meet
2 Smith there in fifteen or twenty minutes.

3 87. Investigators went to Nine Thousand Hair Studio in Tukwila. There,
4 investigators observed a blue BMW 750 (LEM566E) parked in the lot. Smith, identified
5 from his driver's license photograph, got out of the BMW and went into Nine Thousand
6 Hair Studio. Investigators learned that Smith had an outstanding King County felony
7 warrant for his arrest.

8 88. Later, *TT15* received a text message (session 3251) from 206-712-4510
9 reading, "I just got out the chair. You still sliding down here." *TT15* responded, "Be there
10 in 15min." Investigators observed Smith exit the barbershop and get into the BMW.
11 *TT15* received a text message (session 3261) from 206-712-4510 reading, "I need gas
12 anyway I'm going to go across the street to the Shell." Investigators then saw the BMW
13 travel to the Shell gas station across the street.

14 89. Cheatham arrived at the barbershop in a black Lincoln MKX (BHS9481)
15 rental vehicle and then traveled to the Shell gas station. According to Alamo, this vehicle
16 was rented to Cheatham. Cheatham parked near the BMW. Smith got into the front
17 passenger seat of the Lincoln.

18 90. Minutes later, Smith got out of the Lincoln, and Cheatham drove out of the
19 area. Smith got into the driver's seat of the BMW. Marqus Jones, identified from his
20 driver's license photograph, was waiting nearby and got into the front passenger seat of
21 the BMW. After a few minutes, Jones got out of the BMW, got into a black Honda
22 Accord (EMJAY) registered to him, and departed. I know, based on my training and
23 experience, that these types of short interactions inside a parked vehicle are often drug
24 transactions.

25 91. Investigators followed Smith to Wendy's Restaurant in Renton. Smith got
26 in the drive-thru line. As Smith was starting to leave the drive-up window, uniformed
27 Seattle police officers conducted a traffic stop on the BMW. As officers approached
28 Smith, they saw him reaching down near his side. Officers removed Smith from the

1 vehicle and placed him under arrest. Officers could see a semi-automatic pistol lying on
2 the floor next to the driver's seat area where Smith was reaching. Smith was booked for
3 his outstanding warrant. Investigators impounded the BMW and obtained a state search
4 warrant for the vehicle. Investigators seized the loaded handgun and approximately nine
5 ounces of cocaine from the center console of the BMW.

6 92. Later that night, Smith called TT68 from the King County jail. Bellevue
7 police records indicated that TT68 had been used by Jones on police reports. A recording
8 at the beginning of the call informed both parties that the call was recorded. I listened to
9 these recordings. Upon answering, Jones asked, "Yup, who's this?" Smith responded,
10 "Right after I fucking seen you man." Jones asked Smith, "What the fuck?! What
11 happened?!" Smith explained his arrest. Jones asked, "Where's all the shit at? Was it in
12 the car too?" Smith confirmed and stated the police "just towed it" "they took me and
13 towed the car. You know what I mean?" Smith again called TT68 from King County Jail
14 later that night. During this recorded jail call, Jones told Smith that the "police were
15 keeping your car." Smith responded "Oh, no."

16 93. The following morning, Smith called TT68 and spoke to Jones. During the
17 call, Jones asked, "Where's that quarter bird at?" (quarter kilogram or nine ounces of
18 cocaine) Smith said, "It's in the consol." The two discussed how to bail Smith out.

19 94. On November 30, 2017, 206-712-4510, used by Smith, sent text messages
20 (session 3583 and 3585) to **TT15**, used by Cheatham, reading, "We should Chit Chat"
21 and "It's important." Follow up text messages indicated that Smith and Cheatham met in
22 person. Based upon my training and experience, I believe Smith wanted to talk to
23 Cheatham about his arrest.

24 95. On December 1, 2017, **TT15** received a call (session 3657) from TT68. The
25 caller referred himself as "Ace" from "last night" (referring to text messages and meeting
26 referenced in the above paragraph). I recognized that this was the same voice as the user
27 of 206-712-4510 used by Smith. Smith said that he was calling from his cousin's phone
28 because Smith didn't want to call from the other phone. Cheatham said, "Hit me at like

1 seven and we'll make it happen." Based upon my training and experience, I believe that
2 Smith informed Cheatham of his arrest, and Cheatham agreed to continue to deal with
3 Smith with regards to drug trafficking.

4 ***March 2018: Intercepted calls and surveillance***

5 96. On March 5, 2018, **TT46** called 425-429-5848 (session 1669). Based upon
6 the surveillance discussed below, I believe 425-429-5848 was used by Smith. Cheatham
7 told Smith to meet him at the "barber shop." Earlier, **TT46** had received a call from 425-
8 429-5848 during which Smith said he was going to meet with Cheatham (session 1655).

9 97. Investigators monitored video surveillance at Nine Thousand Hair Studio.
10 Approximately ten minutes after the above call, investigators saw a silver Mercedes
11 arrive in the parking lot. **TT46** then received a text message from 425-429-5848 reading,
12 "I'm here in a lil silver Benz" (session 1673). **TT46** replied, "Ok ten min" (session 1675).

13 98. A little over fifteen minutes later, investigators saw a white Nissan Murano
14 arrive and park in the lot of the Nine Thousand Hair Studio. Cheatham got out of the
15 Murano,¹⁴ and Smith got out of the Mercedes. The two could be seen meeting behind the
16 Murano. A few seconds later, Smith returned to the Mercedes placing his right hand in
17 the area of his chest underneath his coat as if placing something in an inside jacket
18 pocket. Cheatham walked into the barber shop, and Smith departed in the Mercedes.

19 99. Investigators followed the Mercedes to Northeast 117th Street where they
20 briefly lost sight of the vehicle. Investigators then found the Mercedes parked in the
21 driveway of **332 Northeast 117th Street**.

22 100. On March 9, 2017, 425-429-5848 called **TT46**. During the call, Smith
23 asked, "I got some dollars for you too. Where I gotta come to?" Cheatham said he was
24
25
26

27 ¹⁴ I have viewed surveillance photographs of Cheatham during the course of this investigation. I have also identified
28 him from these photographs after comparing the photographs with his driver's license photograph. After viewing the
video footage, I recognized the subject getting out of the Murano as Cheatham.

1 down south. Based upon my training and experience, I believe that Smith intended to
2 provide Cheatham with owed drug proceeds.

3 101. On March 28, 2018, investigators saw Smith arrive at **332 Northeast 117th**
4 **Street** driving a black Lexus ES (BFP2758). Smith parked in the driveway. Smith and a
5 passenger walked to the rear of the residence. Later that evening, investigators again saw
6 Smith arrive at the residence in the Lexus. Smith got out of the Lexus with a small
7 unknown package in his hands and walked out of sight to the rear of the residence.

8 ***May 2018: Surveillance at 332 Northeast 117th Street***

9 102. On May 10, 2018, investigators saw the door of **332 Northeast 117th**
10 **Street** closing, but did not see who came out of the residence. Very shortly after,
11 investigators saw Smith on the corner near the house. Smith walked up to the surveillance
12 vehicle and peered inside. The surveillance detective was forced to have a conversation
13 with Smith. Smith then walked back to **332 Northeast 117th Street** and went into the
14 house through the front door.

15 ***Most Recently***

16 103. A review of currently available toll data indicates **TT70**¹⁵ used by
17 Cheatham has been in contact with 425-429-5848 as recently as April 30, 2018. Smith
18 currently lists **332 Northeast 117th Street** on his Washington identification card. On
19 May 17, 2018, Seattle City Light identified Smith as a utility customer at **332 Northeast**
20 **117th Street**. On May 21, 2018, investigators knocked on the door to **332 Northeast**
21 **117th Street**. Smith answered the door and asked what was going on. Investigator gave a
22 ruse and departed.

23 ///

24 ///

25

26

27

28 ¹⁵ According to T-Mobile, on March 24, 2018, the phone number for TT46 changed to 213-263-1148 (TT70), but the IMSI and subscriber name remained the same.

1 **MICHAEL SAFFORD**2 **Associated Locations: No associated locations sought**3 **Associated Vehicles: No associated vehicles sought**

4 104. Discussed below, Michael Safford was identified as a cocaine distributor
 5 who has been supplied by Cheatham. Investigators believe that Safford used 206-483-
 6 8782. Discussed below, investigators seized nine ounces of cocaine after Safford
 7 facilitated a cocaine deal between Cheatham and Jerome Wilson. Investigators currently
 8 do not know the whereabouts of Safford so search warrants related to him are not sought
 9 at this time. Discussed below are observations of a vehicle and locations associated with
 10 Cheatham.

11 ***February 2018: Safford orders thirteen-and-a-half ounces of cocaine***

12 105. On February 22, 2018, Cheatham using **TT46** received a call from Safford
 13 using 206-483-8782 (session 779). Safford identified himself as "Sweet." (CS2 informed
 14 investigators that Safford went by the moniker Sweet after viewing a driver's license
 15 photograph of Safford.) Safford stated he needed a "Sureno." Based upon my training
 16 and experience, I know Sureno to be a term used by street gangs who identify with the
 17 number 13.

18 106. Cheatham asked, "Sureno. Nino. Thirteen?" Safford said, "Yeah." Safford
 19 told Cheatham, "What's the ticket though. I need a deal." Cheatham said, "I get seven,
 20 seven fifty for the nino" (\$7,000 to \$7,500 for nine ounces of cocaine). "I don't do you
 21 like that." "I charge you, basically, it breaks down to eight hundred dollars a zip" (\$800
 22 per ounce). "That's the best I can do." "That's at seventy two for the nina." "That's the
 23 best I can do." "Everbody else it's nine hundred, eight seventy five, something like that."

24 107. Safford asked, "So how much?" Cheatham said, "Seventy two for the nine"
 25 (\$7,200 for nine ounces) "and whatever half of seventy two is, is thirty six, for the four
 26 and the baby" (\$3,600 for four and half ounces). "I charge you eight hundred" "all the
 27 way through." Based upon my training and experience, Cheatham was willing to provide
 28 thirteen and a half ounces of cocaine to Safford for \$800 per ounce.

1 108. Investigators established surveillance at Cheatham's residence at **1412 69th**
2 **Avenue East in Fife, Washington**. Investigators saw Cheatham come out of the
3 residence and get into a **black Cadillac Escalade (BHY8148)**. When Cheatham
4 departed, investigators followed.

5 109. Investigators saw Cheatham arrive at an apartment complex at **2710 South**
6 **256th Place** in Kent. As discussed in more detail in the section regarding Tiffany
7 Younger, Younger resides at **2710 South 256th Place, Apartment C**. Approximately
8 twenty minutes later, Cheatham departed in the Escalade. Several minutes later, **TT46**
9 called Younger using 206-476-5301 (session 818). Cheatham said, "Everything is the
10 same, but I put that Gucci bag is in the closet." Based upon my training, experience, and
11 knowledge of this investigation, I believe that Cheatham obtained the drugs to be
12 delivered to Safford from Younger's apartment.

13 110. **TT46** received a call from 206-483-8782 (session 814). Cheatham said,
14 "I'll be pulling up in like fifteen minutes." Investigators followed Cheatham as he made
15 his way to West Seattle. Eventually, the Escalade arrived at an apartment complex
16 located at 7901 Delridge Way Southwest. At approximately the same time, **TT46** called
17 206-483-8782. Cheatham said, "I'm outside" (session 821). Investigators saw the
18 Escalade park.

19 111. Investigators saw a black male with dreadlocks get into Cheatham's
20 vehicle. This meets the general description of Safford. Fifteen minutes later, the male
21 with dreadlocks got out of the Escalade and went to building 36 towards apartment E.

22 112. Twenty minutes later, **TT46** received a call from 206-483-8782 (session
23 822). Cheatham could be heard yelling at someone to come to him. Safford could be
24 heard telling someone, "He said go out there." Safford said the third party was coming.
25 Investigators saw a subject approach Cheatham's Escalade. Within a minute, the subject
26 departed and investigators saw him go into 7901 Delridge Way Southwest, Building 36,
27 Apartment 36E. The Escalade departed.

1 113. A few minutes later, investigators saw someone come from Apartment 36E,
 2 get into a Jeep Liberty, and depart. Investigators conducted a traffic stop of the Jeep
 3 Liberty after finding a traffic infraction. Investigators identified the driver as Kala
 4 Kinared. According to Seattle Police records, in November 2017, Safford was contacted
 5 as a passenger in vehicle also registered to Kinared.

6 **JEROME WILSON**

7 **Associated Locations: 9739 9th Place Southwest, Unit 102**
 8 **Seattle, Washington**

9 **Associated Vehicles: Black Mercedes 430 (AZX8884)**
 10 **White BMW SD (BIU4803)**

11 114. Discussed below, Jerome Wilson was identified as a cocaine distributor
 12 who has been supplied by Cheatham. Investigators believe Michael Safford facilitated a
 13 nine-ounce cocaine deal between Cheatham and Wilson. Discussed below, investigators
 14 seized the nine ounces of cocaine from Wilson. Wilson was also in possession of two
 15 handguns.

16 ***March 2018: Seizure of a "nina" or "nino" (nine ounces of cocaine)***

17 115. On March 8, 2018, Cheatham using **TT46** received a call from Safford
 18 using 206-483-8782 (session 1894). During the call, Cheatham asked, "What's
 19 happening?" Safford replied, "Nina?" Cheatham responded, "Who, the nino?" Safford
 20 said, "Yeah." "I'll call you when I get home. **TT46** later received another call from 206-
 21 483-8782 (session 1895). Safford asked, "Seventy two right?" Cheatham said, "Yeah."
 22 Safford said, "Why don't you just meet him and just give me my two hundred dollars
 23 tomorrow or something." Cheatham said, "Alright." Safford said, "He got seventy four."

24 116. Based upon my training and experience, I believe that Safford was
 25 facilitating a nine-ounce cocaine deal between Cheatham and a man investigators later
 26 learned was Jerome Wilson. I believe Safford was charging Wilson \$7,400 for the nine
 27 ounces and Safford would later collect \$200 in profit from Cheatham after the sale.
 28

1 117. A few minutes later, **TT46** received a call from Jerome Wilson using 425-
 2 524-6320 (session 1897). Wilson said he wanted to “get with” Cheatham. The parties
 3 agreed to meet in about an hour at “at the highway” on “two sixtieth” at “KFC.” This is
 4 the location of a Kentucky Fried Chicken (KFC) on Pacific Highway South in Des
 5 Moines, Washington. About half an hour later, video surveillance established at Nine
 6 Thousand Hair Studio showed Cheatham leave the barbershop in a **black Cadillac**
 7 **Escalade (BHY8148)**.

8 118. After another half hour, investigators saw a gold Chevrolet Suburban
 9 (AAP2811) registered to Wilson arrive and park in the lot of the KFC on Pacific
 10 Highway South. **TT46** received a call from 425-524-6320 (session 1905). Wilson asked if
 11 Cheatham was coming to KFC. Cheatham said he would be there in ten minutes.

12 119. Twenty minutes later, investigators observed the Escalade pull into the
 13 KFC lot and park next to the Suburban. Investigators could see the drivers of both
 14 vehicles talking to each other. Shortly thereafter, both vehicles departed.

15 120. Investigators followed the Suburban until uniformed officers could stop it.
 16 The driver and sole occupant of the Suburban was identified as Jerome Wilson. Officers
 17 asked for consent to search the Suburban. Wilson declined to provide consent. A drug
 18 detection canine responded to the traffic stop and gave a positive indication for the
 19 presence of narcotics order emanating from the Suburban. Wilson was given the
 20 opportunity to leave if he did not want to wait for his vehicle to be thoroughly searched.
 21 Wilson decided to walk away on foot. Officers searched the Suburban, locating and
 22 seizing two handguns and approximately nine ounces of suspected cocaine located
 23 underneath the cup holder in the center console of the Suburban.

24 ***April 2018: Surveillance at 9739 9th Place Southwest, Unit 102***

25 121. On April 2, 2018, investigators went to **9739 9th Place Southwest, Unit**
 26 **102**, Seattle, Washington. This address is listed on Wilson’s driver’s license.
 27 Investigators saw a **black Mercedes 430 (AZX8884)** registered to Wilson parked in front
 28 of the residence.

122. On April 30, 2018, investigators observed the **black Mercedes 430 (AZX8884)** parked in front of **9739 Place Southwest, Unit 102**. The Mercedes is registered to Wilson. Investigators saw Wilson come from the front of **Unit 102** to the Mercedes. Wilson sat in the Mercedes for a brief period then walked back toward Apartment 102. Later, Wilson came from the porch of **Unit 102** and got into a Dodge Durango that arrived at approximately the same time. The Durango departed and returned in a little over five minutes. Wilson got out of the Durango and walked to the front door of **Unit 102**.

May 2018: Surveillance at 9739 9th Place Southwest, Unit 102

123. On May 13, 2018, investigators observed the **black Mercedes 430 (AZX8884)** and a **white BMW SD (BIU4803)** registered to Wilson parked in front of **9739 9th Place Southwest, Unit 102**.

124. On May 20, 2018, investigators saw the **black Mercedes 430 (AZX8884)** parked in front of **9739 9th Place Southwest, Unit 102**.

Most Recently

125. On May 21, 2018, investigators saw the **white BMW SD (BIU4803)** parked in front of **9739 9th Place Southwest, Unit 102**. Wilson currently lists **9739 9th Place Southwest, Unit 102** on his driver's license.

ALONZO BAGGETT

**Associated Locations: 503 North 4th Avenue Southwest
Tumwater, Washington**

Associated Vehicles: Gold Ford Taurus (SH11119)

126. Based upon intercepted calls, I believe Cheatham supplies Baggett with cocaine and heroin. Discussed below, Alonzo Baggett was identified using TT32 for which a tracking warrant was authorized. GPS data indicated that TT32 was frequently in the vicinity of **503 North 4th Avenue Southwest, Tumwater, Washington** during overnight hours. Investigators went to that location and saw Baggett leave. GPS data indicated TT32 left as well. Later, GPS data indicated that TT32 was at pizza restaurant

1 in Olympia. Investigators went to that location and found Baggett there, leading
2 investigators to believe Baggett was holding TT32.

3 127. Also discussed below, investigators intercepted Baggett using another
4 telephone as well. Baggett was identified using this phone during physical surveillance
5 conducted contemporaneously with intercepted calls.

6 *November 2017: Cheatham supplies Baggett with a half kilogram of cocaine*

7 128. On November 13, 2017, Cheatham using **TT15** received a call from
8 Baggett using TT32 (session 1479). Baggett said, "I am trying to get a half a thang" (a
9 half kilogram of cocaine). "Just give me a price on it and we go from there." Cheatham
10 said, "Even fifteen, seventy-five, seventy-five" (\$15,000 for half the kilogram which is
11 also two quarter kilograms that would cost \$7,500 each). Cheatham said he would be
12 "ready" about 3:30 p.m. Based upon my training and experience, I believe that Cheatham
13 agreed to provide a half kilogram of cocaine to Baggett for \$15,000.

14 *December 2017: Surveillance of TT32*

15 129. On December 7, 2017, GPS data indicated TT32 was in the vicinity of **503**
16 **North 4th Avenue Southwest**, Tumwater, Washington. Investigators went to that
17 location and saw a **gold Ford Taurus (SH11119)** parked in the driveway. Baggett
18 wearing a Seattle Sonics hat and sweatshirt came out of **503 North 4th Avenue**
19 **Southwest** and got into the driver seat of the **gold Ford Taurus (SH11119)**. A few
20 minutes later, Baggett went back into the residence. Baggett returned to the Taurus and
21 departed.

22 130. Investigators located the Taurus at a gas pump of a nearby 7-Eleven
23 convenience store. Baggett was in the driver's seat of the Taurus. Investigators saw a
24 female get out of the passenger seat and get into a Dodge pick-up truck and depart. Based
25 upon my training and experience, this brief encounter was consistent with a drug
26 transaction. The Taurus also departed.

27 131. Later, GPS data indicated TT32 was in the vicinity of Old School Pizzeria
28 in Olympia, Washington. There, investigators saw Baggett walking into the restaurant

1 and observed the **gold Ford Taurus (SH11119)** in the parking lot. Investigators took
2 photographs of Baggett while in the restaurant. Investigators later compared the
3 photographs with Baggett's driver's license photograph and confirmed his identity.

4 *February 2018: Cheatham supplies Baggett with a "nina" (9 ounces of cocaine),*
5 *a "baby" (4½ ounces of cocaine), and four of the "darky" (four ounces of*
6 *heroin)*

7 132. On February 20, 2018, Cheatham using **TT46** called 206-476-2534 (session
8 594). Investigators learned that Baggett was using this phone after conducting physical
9 surveillance in conjunction with the following intercepted calls. During this call, Baggett
10 said he was in "Olympia" and needed "Nine and four" (a nine-ounce unit of cocaine and
11 a four-and-a-half ounce unit of cocaine).

12 133. Later, **TT46** received a call (session 601) from 206-476-2534. Baggett said
13 he was on the way. Cheatham said to meet "by two sixtieth." Cheatham asked, "What
14 you say, the nina" (9 ounces of cocaine) "and the baby" (4½ ounces of cocaine). Baggett
15 affirmed and stated he also needed "four of the other." Cheatham asked, "The darky?"
16 (heroin). Baggett confirmed.

17 134. Later, **TT46** received a call from 206-476-2534 (session 612). Cheatham
18 told Baggett to wait at the "casino by Fife" (Emerald Queen Casino).

19 135. Approximately half an hour later, investigators conducting surveillance at
20 **2710 South 256th Place, Apartment C**, Kent, Washington, saw Cheatham arrive in the
21 **black Cadillac Escalade (BHY8148)**. Investigators observed Cheatham go into
22 **Apartment C**. Almost thirty minutes later, investigators observed Cheatham come out
23 and depart in the Escalade.

24 136. Investigators went to the Emerald Queen Casino and saw **the gold Ford**
25 **Taurus (SH11119)** being driven by Baggett (identified from his driver's license
26 photograph). Eventually, Baggett left the lot in the Taurus shortly after a marked police
27 vehicle drove through the parking lot. Investigators followed the Taurus a short distance
28 away to the Tahoma Market on Pacific Highway East.

1 137. **TT46** called 206-476-2534 (session 625). Baggett told Cheatham that he
 2 went to the "Shell" because "the boys rolled through" (police). Cheatham asked if there
 3 was a store called "Tahoma Mart." Baggett said there was. Cheatham said he would be
 4 over there.

5 138. Investigators observed Cheatham arrive at the Tahoma Market in the **black**
 6 **Cadillac Escalade (BHY8148)** and park next to the **gold Ford Taurus (SH11119)**.
 7 Baggett got out of the Taurus and into the front passenger seat of the Escalade. After a
 8 few minutes, Baggett got out of the Escalade and departed in the Taurus. Cheatham
 9 departed in the Escalade as well.

10 ***May 2018: Surveillance at 503 North 4th Avenue Southwest***

11 139. On May 4, 2018, investigators saw the **gold Ford Taurus (SH11119)**
 12 parked next to **503 North 4th Avenue Southwest**. Investigators observed Baggett exit
 13 the west side of the house and go to the Taurus, then walk to the back of the house and go
 14 inside a back door.

15 ***Most Recently***

16 140. A review of currently available toll data indicates TT70 used by Cheatham
 17 has been in contact with 206-476-2534 as recently as March 31, 2018.

18 141. On May 23, 2018, investigators saw the **gold Ford Taurus (SH11119)**
 19 parked in front of **503 North 4th Avenue Southwest**.

20 142. Both Baggett's driver's license and vehicle registration currently list **503**
 21 **North 4th Avenue Southwest** as his address.

22 **EDDRICK BAKER**

23 **Associated Locations: No associated location sought**

24 **Associated Vehicles: Black Chrysler 300 (BDG7917)**

25 143. Based upon intercepted calls, I believe Cheatham supplies Baker with
 26 cocaine. Discussed below, Eddrick Baker was identified using TT36 during physical
 27 surveillance conducted contemporaneously with intercepted calls. A tracking warrant was
 28 authorized for TT36. Investigators went to locations for which GPS data indicated TT36

1 was and saw Baker's vehicle at those locations. TT36 is also subscribed to Baker.

2 Investigators do not know where Baker currently resides.

3 *November 2017: Cheatham supplies Baker with a "baby" (4½ ounces of*
4 *cocaine)*

5 144. On November 11, 2017, Cheatham using *TT15* received a call from Baker
6 using TT36 (session 1312). During the call, Baker said he was "trying to catch up" with
7 Cheatham. Baker said he would have to run over to West Seattle and asked Cheatham
8 where he was going to be. Cheatham said, "Where ever I need to be." Baker said
9 something unintelligible and asked Cheatham, "The baby. Do you know what I'm talking
10 about?" Cheatham said, "Yeah the baby, I got you." Cheatham said he was eating at
11 Bahama Breeze, and advised when he was done, "I'll just grab it and we will go from
12 there." Cheatham said to give him about thirty or forty five minutes. Based upon my
13 training and experience, I believe Baker was requesting that Cheatham provide 4½
14 ounces of cocaine (the "baby").

15 145. During session 1350, Baker said he was behind the "Wizards Casino."
16 During session 1352, Cheatham said he arrived at "Wizards Casino." Baker directed
17 Cheatham to "Ernie's Pub." During this call, investigators could hear the sound of Baker
18 counting paper money.

19 146. During session 1354, Cheatham said he could see Baker. Nearly
20 contemporaneous with this call, investigators saw Baker (identified by his driver's license
21 photograph) standing outside a **black Chrysler 300 (BDG7917)** registered to him by
22 Good Time Ernie's Pub next to Wizards Casino in Burien. Investigators saw the Chrysler
23 300 drive towards the bowling alley nearby and park next to a black Lincoln MKX
24 (BHS9481). According to Enterprise, this vehicle was rented to Cheatham. Investigators
25 could see that Cheatham the driver of the Lincoln MKX. There was also a female
26 passenger in the front passenger seat and possibly a second female passenger in the
27 vehicle. Investigators saw Cheatham get out of the Lincoln MKX and get into the
28 Chrysler 300. Investigators could see that Baker was the driver of the Chrysler 300.

1 *November 30, 2017: Baker requests another "baby" (4½ ounces cocaine)*

2 147. On November 30, 2017, **TT15** called TT36 (session 3510). During the call,
3 Cheatham and Baker discussed where to meet. Cheatham said he would "be at the barber
4 shop by two thirty" (2:30 p.m.) "on Pacific Highway on one forty six" (Pacific Highway
5 South and South 146th St.). Cheatham asked, "The baby?" (4½ ounces of cocaine). Baker
6 said, "Yeah."

7 148. At approximately 2:56 p.m., **TT15** called TT36 (session 3534). Baker said
8 he was by the barber shop. Cheatham said he would be there soon. Baker said he would
9 run to the grocery store first. Shortly after this call, investigators saw the **black Chrysler**
10 **300 (BDG7917)** drive by the Nine Thousand Hair Studio located at **3920 South 146th**
11 **Street** in Tukwila.

12 149. Less than fifteen minutes later, investigators saw Cheatham arrive in the
13 Lincoln MKX. Shortly thereafter, investigators observed the **black Chrysler 300**
14 **(BDG7917)** drive into the barber shop parking lot and park. Investigators then watched
15 Cheatham come out of Nine Thousand Hair Studio and get into the front passenger seat
16 of the Chrysler 300. After a short period of time, Cheatham got out of the Chrysler 300
17 and the Chrysler 300 departed.

18 *December and January 2017: Surveillance of TT36*

19 150. On December 13, 2017, GPS data indicated that TT36 was in the vicinity of
20 the Washington Park Apartments in Kent. This is the address listed on Baker's driver's
21 license. Investigators saw the **black Chrysler 300 (BDG7917)** parked there.

22 151. On January 12, 2018, GPS data indicated TT36 was in the vicinity of 6238
23 25th Avenue Northeast, Seattle, Washington. There investigators saw the **black Chrysler**
24 **300 (BDG7917)** parked on the street in front of the residence.

25 152. On January 16, 2018, GPS data indicated TT36 was in the vicinity of the
26 10223 12th Avenue Northeast, Seattle, Washington. Investigators saw the **black Chrysler**
27 **300 (BDG7917)** parked in the driveway there.

28 ///

March 2018: Intercepted call of drug transaction

153. On March 3, 2018, **TT46** used by Charles Cheatham received a call from TT36. Baker said, "I need to get my thing, but I'm like short like three fifty" (short \$350). Cheatham said, "We gonna make it happen." Baker said, "I got at least thirty four right now" (\$3400). Cheatham said, "We gonna make it happen. Just give me a couple hours." Based upon my training and experience, Baker arranged a drug transaction with Cheatham and informed Cheatham that he would have to owe money for this transaction.

Most Recently

154. A review of currently available toll data indicates TT70 used by Cheatham has been in contact with TT36 as recently as April 12, 2018. The **black Chrysler 300 (BDG7917)** is currently registered to Baker.

MARTIN BANKS

Associated Locations: No associated location sought

Associated Vehicles: No associated vehicle sought

155. Based upon intercepted calls, I believe Cheatham supplies Banks with cocaine. Discussed below, Martin Banks was identified using 206-380-5454 during physical surveillance conducted contemporaneously with intercepted calls. At this time, investigators currently do not know the whereabouts of Banks. Discussed below is the use of a vehicle by Cheatham.

November 2017: Banks negotiates price of half kilogram of cocaine

156. November 21, 2017, Cheatham using **TT15** received a call from Banks using 206-380-5454 (session 2460). Banks asked, "How much is half the car?" (a half kilogram of cocaine). Cheatham said, "Man, I am going to let you skate." "I told you to grab the whole thing" (whole kilogram). Banks said, "We don't want to talk nu... How much is half the car?" Cheatham responded, "For you. Two eight" (\$28,000 for the kilogram). Banks said, "Half the car." Cheatham said, "Do the math."

157. Banks replied, "Just 'cause I don't be around, I still know everything that's going on and the tickets and everything. So that don't make no sense." Cheatham said, "I

1 paid two seven two" (\$27,200 per kilogram). Banks said, "No you didn't." "Didn't you
 2 just leave the palm trees?" (Los Angeles). Cheatham said, "I didn't go there for that. "I
 3 went for the black top" (heroin). Banks said, "Ok." "I know." "What you say, fourteen?"
 4 (\$14,000 for the half kilogram). Cheatham said, "Yeah." Banks said, "Just ... uh ... half
 5 of that." Cheatham said, "You always want to cut me down. And you don't want me to
 6 get nothing." Banks then said, "Just let me get half of that." "Just the seven" (\$7,000
 7 worth of cocaine).

8 ***March 2018: Drug-related meeting between Cheatham and Banks***

9 158. On March 1, 2018, **TT46** received a call from 206-380-5454 (session
 10 1275). Banks told Cheatham that "It was six short." Almost five hours later, 206-380-
 11 5454 called **TT46** (session 1305). Banks said he was in the "south end" (Rainier Valley).
 12 Cheatham said he would stop by "Tone's" and to meet there. Based upon my training and
 13 experience, I believe the cocaine that Cheatham had previously supplied to Banks was
 14 short six grams. I believe Cheatham was arranging a meeting to make up for the
 15 difference.

16 159. Approximately half an hour later, investigators located the **black Cadillac**
 17 **Escalade (BHY8148)** parked at Willie's Taste of Soul restaurant in the Rainier Valley
 18 area of Seattle. Investigators saw Cheatham, Banks (identified from his driver's license
 19 photograph), and a third subject sitting together in the restaurant. Later, investigators saw
 20 Banks come out of the restaurant and get into white Toyota Camry (BDV5759), a Hertz
 21 rental car. According to Hertz, this vehicle was rented to Martin Banks using address
 22 1126 17th Avenue, Seattle, Washington. Investigators then followed Banks to 1126 17th
 23 Avenue, where Banks parked in the alley behind the residence.

24 ***March 2018: Cheatham supplies Banks with a "nino" (9 ounces of cocaine)***

25 160. On March 6, 2018, Cheatham using **TT46** received a call from Banks using
 26 206-380-5454 (session 1737). During the call Cheatham said, "You didn't even come get
 27 that shit." Banks said, "I already told you I was going to call you and switch that up to the
 28

1 first thing you said too." Cheatham asked, "The nino?" (nine ounces of cocaine). Banks
2 said to call him when Cheatham was done.

3 161. Later, **TT46** called 206-380-5454 (session 1763). Banks said he was "at
4 Mattress Firm" in "Southcenter." Investigators went to Mattress Firm on Southcenter
5 Parkway in Tukwila. Approximately fifteen minutes later, **TT46** called 206-380-5454
6 (session 1765). Banks confirmed with Cheatham that he was at the "Mattress Firm"
7 across from "IHOP" "two blocks down" from "Men's Warehouse." At approximately the
8 same time, investigators observed the **black Cadillac Escalade (BHY8148)** arrive and
9 park. Cheatham got out of the driver's seat of the Cadillac and went inside Mattress Firm.

10 162. Investigators saw the white Toyota Camry (BDV5759) rented to Banks
11 parked in front of the business. Cheatham, Banks (identified from his driver license
12 photograph), and a female exited the business. Cheatham got into the driver's seat of the
13 Escalade and Banks got into the passenger seat. After a brief period, Banks got out of the
14 Escalade and got into the white Toyota Camry. Both departed. Based upon my training
15 and experience, Banks and Cheatham completed a drug transaction.

16 **BRANDEN BARNETT**

17 **Associated Locations: 15108 Southeast 179th Street**
18 **Apartment 3J, Renton, Washington**

19 **Associated Vehicles: Gold Range Rover (BHX9476)**

20 163. Based upon intercepted calls, I believe Cheatham supplies Branden Barnett
21 with cocaine. Discussed below, Barnett was identified using 206-898-4084 during
22 physical surveillance conducted contemporaneously with intercepted calls. This phone
23 number is also subscribed to Barnett.

24 ***February 2018: Cheatham has Reynolds provide Barnett with cocaine***

25 164. On February 23, 2018, Cheatham using **TT46** received call from Barnett
26 using 206-898-4084 (session 858). Barnett said he was at the "barbershop." Cheatham
27 said, "My barbershop?" Barnett confirmed and then could be heard greeting someone in
28 the background. Barnett said, "I need some of that white girl" (cocaine). Cheatham asked,

1 “What you need that shit for?” Barnett asked, “What is you, you getting out of the truck?
2 That’s you?”

3 165. Contemporaneous with this call, investigators observed Barnett standing
4 outside Nine Thousand Hair Studio on the phone. Barnett could be seen greeting
5 someone. Investigators observed the **black Cadillac Escalade (BHY8148)** arrive in the
6 lot. Barnett and Cheatham met and spoke with each other. After several minutes, Barnett
7 departed in a **gold Range Rover (BHX9476)**.

8 166. **TT46** then called TT35 used by Lamont Reynolds¹⁶ (session 860).
9 Cheatham asked if Reynolds was still at the house (**1412 69th Avenue East**). Reynolds
10 said, “Yeah.” Cheatham asked for Reynolds to grab the bag out of the drawer in the room
11 and said, “They got my money in that bag.” “Should be two single szoft ones” (two units
12 of cocaine). Cheatham then said, “He leaving the barbershop.” “When you passing two
13 seventy second, call my phone.”

14 167. **TT46** later called TT35 (session 865). Cheatham said, “He going to be in a”
15 “old gold”¹⁷ “Rangerover” (**gold Range Rover (BHX9476)**). Reynolds told Cheatham,
16 “Tell him to meet me at the T-Mobile.”

17 168. **TT46** then called 206-898-4084 (session 866). Cheatham instructed Barnett
18 to “Go to T-Mobile.” Ten seconds later **TT46** called 206-898-4084 (session 867).
19 Cheatham told Barnett to look for a “gray Impala” (**gray Chevrolet Impala**
20 **(BBK1418)**).

21 ***March 2018: Cheatham travels to Barnett’s apartment***

22 169. On March 4, 2018, **TT46** called 206-898-4084 (session 1543). During the
23 call, Barnett asked, “Can you come through?” This was followed by an unintelligible
24 sentence. Cheatham responded, “You got a car.” “What’s wrong with you.” Barnett said
25 his wife had his car. Barnett attempted to provide directions to his location. Cheatham
26

27
28 ¹⁶ Identification discussed in section regarding Lamont Reynolds.

¹⁷ The model year for the gold Landrover (BHX9476) is 1998.

1 told Barnett, "Send me the address." Barnett said to "Google Stonebrook Apartments."
2 Cheatham told Barnett to text the address.

3 170. 206-898-4084 then sent a text message (session 1544) to **TT46** reading,
4 "Stonebrook apartments 12210 se petrovitsky rd Renton washington 98058". Shortly
5 thereafter, **TT46** called 206-898-4084. Barnett told Cheatham that he was in "H204."

6 ***March 2018: Surveillance at Stonebrook Apartments***

7 171. On March 21, 2018, investigators observed a **gold Range Rover**
8 **(BHX9476)** at the Stonebrook Apartments. Investigators saw Barnett (identified from his
9 driver's license photograph) and two unknown women come from the stairwell to
10 Apartment H204, get into the Range Rover, and depart. Barnett was the driver.

11 172. Again, on March 24, 2018, investigators observed Barnett come from the
12 stairwell to Apartment H204 at the Stonebrook Apartments and depart in the **gold Range**
13 **Rover (BHX9476)**.

14 ***May 2018: Surveillance at 15108 Southeast 179th Street Apartment 3J***

15 173. For several days in the first week of May 2018, investigators conducted
16 surveillance at 12210 Petrovitsky Road Southeast Apartment H204. According to PSE,
17 Ieesha Kelly was the utilities customer here prior to March, discontinuing service on
18 March 19, 2018. Investigators noticed that the **gold Range Rover (BHX9476)** was no
19 longer at that residence. Investigators conducted a commercial law enforcement database
20 check and learned that the Ieesha Kelly now was a utility customer at **15108 Southeast**
21 **179th Street, Apartment 3J**, Renton, Washington.

22 174. According to PSE, Teraijanique Surge started service with at **15108**
23 **Southeast 179th Street, Apartment 3J** on April 14, 2018. The address listed on Surge's
24 Washington ID card is 12210 Petrovitsky Road Southeast, Apartment H204.

25 175. On May 8, 2018, investigators went to **15108 Southeast 179th Street,**
26 **Apartment 3J** and saw Barnett exit the alcove that led directly to apartment 3J and walk
27 through the parking lot. Based upon these circumstances, I believe Barnett moved from
28 the Stonebrook Apartments to **15108 Southeast 179th Street, Apartment 3J**.

176. Again on May 9, 2018, investigators saw Barnett walk out of the alcove leading directly to **Apartment 3J**. He briefly met with a person who arrived in a vehicle, and then returned to **Apartment 3J**. Later, in the late evening hours, investigators saw a Nissan Altima, California license 7YRZ854, arrive and park in the lot. This was a rental vehicle. Investigators saw Barnett exit the alcove to **Apartment 3J** and meet someone who got out of the Altima. It appeared that Barnett exchanged something with the person. Barnett then walked back towards **Apartment 3J**. Based upon my training, experience, and knowledge of this investigation, I believe this may have been a drug transaction.

Most Recently

177. A review of currently available toll data indicates TT70 used by Cheatham has been in contact with 206-898-4084 as recently as May 6, 2018.

178. On May 21, 2018, investigators observed the **gold Range Rover (BHX9476)** arrive at **15108 Southeast 179th Street**. The garage door was remotely opened and a female got out of the front passenger seat. The Range Rover parked in the garage and a heavy set black male got out of the driver's seat and closed the garage door. This is Barnett's general description. Both exited through the rear door of the garage and went into **Apartment 3J**. Investigators also observed a green Honda Accord (BEN9277) in the garage. This vehicle is registered to Ieesha Kelly, the PSE customer at Barnett's previous residence.

CARLOS DENNIS

Associated Locations: 2407 123rd Street Southeast, Everett, Washington

Associated Vehicles: silver Chevrolet Silverado (WSU386G)

179. Based upon intercepted calls, I believe Cheatham supplies Dennis with cocaine. Discussed below, Carlos Dennis was identified using TT63 for which a tracking warrant was authorized. GPS data for TT63 was not precise enough to locate Dennis, so investigators obtained court authorization to use a cell-site simulator to locate Dennis. Investigators were able to identify Dennis's residence. Once his residence was identified,

1 investigators conducted physical surveillance in conjunction with GPS data for TT63 and
2 determined that TT63 travelled with Dennis.

3 ***February 2018: Dennis arranges to obtain a "baby" (4½ ounces of cocaine)***

4 180. On February 28, 2018, Cheatham using **TT46** received a call from Dennis
5 using TT63 (session 1197). Dennis said, "I want that little bznay" (4½ ounces of cocaine)
6 "right now for real." Cheatham said, "I got it for you. I went and got everything." Dennis
7 said, "I already done about seven, eight" and if he got about "five more I'm gonna get
8 another heezy" (half a kilogram of cocaine). Based on my training and experience I know
9 "bznay" to be a play on the word "baby" which refers to four and a half ounces of
10 cocaine. Similarly, "heezy" is a play on the word "half" which refers to a half a kilogram
11 of cocaine. I believe that Dennis wanted to immediately obtain four-and-a-half ounces of
12 cocaine from Cheatham, and was saving up the money to purchase half a kilogram of
13 cocaine.

14 ***March 2018: Dennis arranges to obtain 13½ ounces of cocaine***

15 181. On March 14, 2018, **TT46** received a call from TT63 (session 2683). The
16 intercept system did not intercept the very beginning of call. During the call, Cheatham
17 said, "I'm a head out of here" "before one o'clock." Dennis said, "That's cool."
18 Cheatham asked, "Thirteen and a half. That right?" Dennis said, "Yeah." Based on my
19 training and experience I believe Dennis called Cheatham to supply him with thirteen and
20 a half ounces of cocaine. As previously discussed, this is a "nino" (nine ounces of
21 cocaine) and a "baby" (4½ ounces of cocaine) combined. Follow up calls indicated that
22 the two met in the Everett, Washington area.

23 ***May 2018: Surveillance at 2407 123rd Street Southeast***

24 182. On May 9, 2018, investigators, under court authorization, used a cell-site
25 simulator to precisely locate TT63. GPS data obtained from the tracking warrant was not
26 precise enough to locate the phone. With the use of the cell-site simulator, investigators
27 were able to locate TT63 in the vicinity of **2407 123rd Street Southeast**, Everett,
28

1 Washington. There, investigators saw a **silver Chevrolet Silverado (WSU386G)** parked
2 in the driveway.

3 183. On May 11, 2018, GPS data indicated that TT63 was in the vicinity of **2407**
4 **123rd Street Southeast**. Investigators went to this location and watched the garage door
5 open at the residence. Investigators saw Dennis, identified by his driver's license
6 photograph, come from an interior garage door and get into a **black Range Rover**
7 **(BJK9871)** in the garage. Less than half an hour later, Dennis returned and drove into the
8 garage. GPS data for TT63 was not precise enough for investigators to determine if TT63
9 departed with Dennis. More than forty minutes later, Dennis again left in the Range
10 Rover. This time it was apparent from GPS data that TT63 left the vicinity of 2407 123rd
11 Street Southeast.

12 184. On May 15, 2018, investigators went to **2407 123rd Street Southeast**. GPS
13 data indicated that TT63 was in the vicinity. Investigators saw the **silver Chevrolet**
14 **Silverado (WSU386G)** in the driveway. Investigators saw the garage door to the
15 residence open and saw Dennis walk outside. Dennis got into the Silverado and drove
16 away. Investigators followed. Dennis drove out of the neighborhood and onto southbound
17 Interstate 5. Investigators followed Dennis from Everett to the Mercer Street exit in
18 Seattle where Dennis exited. Even though GPS data for TT63 had a large margin of error,
19 the data indicated TT63 mirrored this path.

20 ***Most Recently***

21 185. A review of currently available toll data indicates TT70 used by Cheatham
22 has been in contact with TT63 as recent as May 5, 2018. The **silver Chevrolet Silverado**
23 **(WSU386G)** is currently registered to Rachel James and lists **2407 123rd Street**
24 **Southeast** on the registration. On May 17, 2017, Snohomish PUD indicated that Rachel
25 James is a utility customer at **2407 123rd Street Southeast**.

26 186. On May 21, 2018, GPS data indicated that TT63 was in the vicinity of **2407**
27 **123rd Street Southeast**. Investigators went to that location and saw the **silver Chevrolet**
28 **Silverado (WSU386G)** parked in the driveway.

1 **DOMINIQUE JIMERSON**

2 **Associated Locations: 10632 4th Avenue Southwest, Seattle, Washington**

3 **Associated Vehicles: Gray Volvo Wagon (BDF6399)**
 4 **Green Chevrolet El Camino (B35016L)**

5 187. Based upon intercepted calls, I believe Cheatham supplies Jimerson with
 6 cocaine. Discussed below, Dominique Jimerson was identified using TT29 for which a
 7 tracking warrant was authorized. GPS data indicated that TT29 was often in the vicinity
 8 of **10632 4th Avenue Southwest, Seattle, Washington** during overnight hours. Discussed
 9 below, investigators conducted physical surveillance in conjunction with GPS data and
 10 determined TT29 traveled with Jimerson.

11 *November 2017: Dispute about amount of drugs provided*

12 188. On November 4, 2017, Cheatham using **TT15** received a call from
 13 Jimerson using TT29 (session 193). During the call, Jimerson said, "I just, put it together
 14 right?" "One is like five grams short." Cheatham responded, "What do you mean?"
 15 Jimerson said, "I just put it all" "in one. I hit one last night to make sure it was straight
 16 and one" "is like twenty-three." "It's short, it's short, like five." After discussing further,
 17 Cheatham asked, "Out of nine of them, one of them came back twenty three?" Jimerson
 18 confirmed. Based upon my training and experience, I know that there are 28 grams in one
 19 ounce. I believe that Jimerson was informing Cheatham that out of nine ounces of
 20 cocaine provided by Cheatham, one of the ounces was five grams short.

21 *November and December 2017: Surveillance of TT29*

22 189. On November 30, 2017, GPS data indicated TT29 was in the vicinity of
 23 **10632 4th Avenue Southwest, Seattle, Washington**. There, investigators saw a male get
 24 into a **gray Volvo wagon (BDF6399)** and depart. Investigators took photographs of the
 25 subject. The Volvo was registered to Dominique Jimerson listing address **10632 4th**
 26 **Avenue Southwest**. GPS data indicated that TT29 also departed. Investigators followed
 27 the Volvo. GPS data for TT29 matched the travels of the Volvo.
 28

1 190. On December 1, 2017, GPS data for TT29 indicated that the phone was in
2 the vicinity of **10632 4th Avenue Southwest**. There, investigators located a **green**
3 **Chevrolet El Camino (B35016L)** registered to Dominique Jimerson. Investigators
4 observed the **gray Volvo wagon (BDF6399)** arrive and park in front of the residence.
5 Investigators observed a male get out of the gray Volvo. Investigators observed this
6 subject go into the residence.

7 191. Later, investigators observed the Volvo leave with two occupants. GPS data
8 for TT29 indicated the phone departed as well. GPS data for TT29 indicated that the
9 phone traveled to south Seattle. Investigators went to the south Seattle location and found
10 the gray Volvo parked at another residence.

11 192. On December 4, 2017, GPS data for TT29 indicated the phone was in the
12 vicinity of a Taco Time in White Center. Investigators went to that location and saw a
13 male driving the **gray Volvo wagon (BDF6399)** and soon lost sight the vehicle.
14 Investigators identified this as the same subject traveling in the gray Volvo photographed
15 on November 30, 2017. GPS data indicated that the phone traveled to **10632 4th Avenue**
16 **Southwest**. Investigators located the Volvo there.

17 193. On December 6, 2017, GPS data for TT29 indicated the phone was in the
18 vicinity of 1st Avenue South and Southwest 108th Street, Seattle. Investigator located the
19 **green Chevrolet El Camino (B35016L)** being driven by the same photographed subject
20 from November 30, 2017. A detective conducting surveillance was able to get a clear
21 enough view of the driver and was able to identify the driver as Dominique Jimerson from
22 his driver's license photograph. Investigators lost sight of the El Camino. Investigators
23 went to **10632 4th Avenue Southwest** and observed Jimerson arrive at the residence in
24 the El Camino. GPS data for TT29 indicated that the phone also arrived in the vicinity. I
25 viewed the surveillance photographs and after comparing them to the driver's license
26 photograph of Jimerson, I believe that the subject depicted in the photographs is
27 Jimerson.

28 ///

March 2018: Cheatham provides a half kilogram of cocaine to Jimerson

194. On March 2, 2018, Cheatham using **TT46** received a call from TT29 (session 1400). Jimerson said, "I'm kinda ready." "You ready right now?" Cheatham said, "Not right this second." Jimerson said, "I need you to work with me though. I just tryin' to throw a number out here for you." Cheatham said, "For starters can I get my two dollars?" (\$200 or possibly \$2,000). Jimerson affirmed. Cheatham then said, "Nah, but what you talking about?"

195. Jimerson said, "I telling you the half" (half kilogram of cocaine) "for the fourteen" (\$14,000). Cheatham said, "Give me fourteen two" (\$14,200). Jimerson agreed. Cheatham said he needed an hour or hour and a half. Based upon my training and experience, I believe that Jimerson owed a \$200 debt for a previous drug transaction with Cheatham. I also believe that Cheatham agreed to provide a half kilogram of cocaine to Jimerson for \$14,200.

May 2018: Surveillance at 10632 4th Avenue Southwest

196. On May 3, 2018 investigators observed the **green Chevrolet El Camino (B35016L)** parked next to **10632 4th Avenue Southwest**. Investigators saw the **gray Volvo wagon (BDF6399)** arrive. A woman and child got out and went into the house. Later, investigators saw Jimerson come out of **10632 4th Avenue Southwest** and throw trash into the trash can in the driveway. Jimerson walked to the Volvo and sat in the car for a brief period and then returned to the house. Investigators saw Jimerson walk into the front door of the residence.

Most Recently

197. A review of currently available toll data indicates TT70 used by Cheatham has been in contact with TT29 as recently as May 9, 2018. Jimerson currently lists **10632 4th Avenue Southwest** on his driver's license.

198. On May 21, 2018, investigators saw Jimerson depart **10632 4th Avenue Southwest** in the **gray Volvo wagon (BDF6399)**.

///

1 **BRADFORD STREET**2 **Associated Locations: 7721 20th Avenue Southwest, Seattle, Washington**3 **Associated Vehicles: Silver Mercedes S55 (BAL1564)**
4 **Silver Audi A4 (BHH5506)**

5 199. Based upon intercepted calls, I believe Cheatham supplies Street with
6 cocaine. Discussed below, Bradford Street was identified using TT34 for which a
7 tracking warrant was authorized. GPS data indicated that TT34 was often in the vicinity
8 of **7721 20th Avenue Southwest**, Seattle, Washington during overnight hours.
9 Investigators identified Bradford Street as the user of TT34 both from conducting
10 physical surveillance conducted contemporaneously with intercepted calls and by
11 locating him at various locations TT34 traveled to.

12 ***November 2017: Reynolds delivers to Street for Cheatham***

13 200. On November 8, 2017, Cheatham using **TT15** received a call from Street
14 using TT34 (session 863). During the call, Cheatham said, "B. I'm makin' it happen right
15 now, that's why I ain't answer you." "My brother gonna meet you." Cheatham said that
16 he wasn't in town and said he would "make it happen." Later, **TT15** placed an outgoing
17 call to TT34 (session 866). Cheatham addressed the individual on the other end of call as
18 "Brad" and asked where he was. Street replied, "I'm at my spot."

19 201. **TT15** called Lamont Reynolds (identification discussed in the section
20 regarding Reynolds) using TT35 (Session 881). Cheatham told Reynolds that he would
21 see the "Sutton Suites" and then provided directions on where Reynolds should go once
22 he pulled into the hotel parking lot. Discussed in the sections regarding Marcus Hall and
23 Donnie Cheatham, Charles Cheatham gave directions regarding drug deliveries to them
24 as well.

25 202. Later, TT34 (Street) called **TT15** (session 888). During the call, Street
26 asked, "Hello, is he out there?" Cheatham said, "He's about to be there in three minutes."
27 Street said he would go outside. A few minutes later, **TT15** received a call from TT34
28

1 (Session 891). Street said "he" (Reynolds) is not here yet. Cheatham said, "he" should be
2 pulling up any second. Street stated, "Tell him I've got my green coat with the hood on."

3 203. Approximately two minutes later, **TT15** called TT35 (Reynolds) (session
4 893). Cheatham said, "He said he's out there in a green coat." Reynolds said, "Yup,
5 Yup." Reynolds could be heard speaking to another person in the background saying
6 "You got it" "Fo sho bro." Based upon the timing of this call, I believe that Reynolds was
7 speaking to Street. Based upon my training and experience, I believe that Cheatham
8 directed Reynolds to make a drug delivery to Street on his behalf.

9 *November 2017: Cheatham delivers to Street*

10 204. On November 15, 2017, **TT15** receive a call from TT34 (session 1675),
11 Street asks, "Hey, hey fam, you got some more of that fire?" Cheatham, sounding like he
12 was just awakened responded, "I'll check when I get up and let you know." Later, **TT15**
13 received a call from TT34 (session 1698). Cheatham said he was on the freeway "passing
14 two seventy second." Street asked if Cheatham is bringing Street some "fire" (marijuana).
15 Cheatham said he did not have any, but was "trying to see if" his brother had some of that
16 "bubble or something." Based upon my training, experience, and knowledge of this
17 investigation, I believe that although Street inquired about marijuana, Cheatham was
18 meeting Street to supply him with cocaine. I believe that Cheatham and Street did not
19 have to discuss the amount of drug Cheatham needed to provide to Street because both
20 likely understood the amount to be the same as previous transactions.

21 205. Investigators went to the Sutton Suites Extended Stay in SeaTac.
22 Investigators saw Street, identified from his driver's license photograph, go to a **silver**
23 **Mercedes S55 (BAL1564)**. Investigators then saw a black Lincoln MKX (BHS9481)
24 rental vehicle arrive. According to Alamo, this vehicle was rented to Cheatham. Street
25 got into the Lincoln. Within a minute, Street got out of the Lincoln and returned to the
26 Sutton Suites. A few minutes later, Street returned to the Mercedes and departed in it.

27 ///

28 ///

December 2017: Surveillance of TT34

206. On December 12, 2017, GPS data indicated TT34 was in the vicinity of the Rainier Square Plaza in south Seattle. There investigators saw Street exit the Magic Dragon restaurant and get into the **silver Mercedes S55 (BAL1564)** and depart.

207. Later in the evening, GPS data indicated TT34 returned to the Rainier Square Plaza. Investigators saw the Mercedes parked in front of a Ross Dress for Less store there. Investigators then saw Street come out of the store, get into the Mercedes, and then get into the passenger seat of a silver Volvo. Moments later, Street returned to the Mercedes. Based upon my training and experience, this observation was consistent with a drug transaction. Street then went back into Ross.

208. On December 13, 2017, GPS data indicated TT34 was in the vicinity of a Big Lots store in Burien. Investigators went to that location and saw Street come out of the store, get into the **silver Mercedes S55 (BAL1564)**, and depart. When Street left the area, GPS data indicated that TT34 did as well.

March 4, 2018: Street negotiates the price of a kilogram of cocaine

209. On March 4, 2018, Cheatham using **TT46** received a call from TT34 (session 1512). The intercept system did not capture the first few seconds of the call. The call started with Cheatham saying, "Twenty eight five" (\$28,500 for a kilogram of cocaine). Street asked, "Can I get the half of that for the fourteen?" Cheatham said, "Fourteen two" (\$14,200). Street said, "Oh my god." "Come on." Cheatham said, "I'm going to work with you." "It's way better than sixteen ain't it?" Street said, "Shit. God damn. Fourteen two hundred." After some negotiation Cheatham said, "You can get the nina" (nine ounces of cocaine) "right now for seventy five" (\$7,500). Street said, "I'm trying to get more than that." "I need five or six of those motherfuckas." Cheatham said, "You come and get the whole thing at one time, I'm going to give you twenty eight. If you want the half, fourteen two." "That's the best I can do like that."

210. Based upon my training and experience, I believe that Street was negotiating the price for a kilogram and a half kilogram of cocaine. Cheatham offered

1 \$28,000 for the kilogram, \$14,200 for the half kilogram, and \$7,500 for the quarter
2 kilogram.

3 ***May 2018: Surveillance at 7721 20th Avenue Southwest***

4 211. On May 4, 2018, investigators observed a **silver Audi A4 (BHH5506)**
5 registered to Street in the driveway of **7721 20th Avenue Southwest**, Seattle,
6 Washington. While there, investigators observed the **silver Mercedes S55 (BAL1564)**
7 arrive and park in the driveway. Street got out of the Mercedes and went into the house.

8 ***Most Recently***

9 212. A review of currently available toll data indicates TT70 used by Cheatham
10 has been in contact with TT34 as recently as May 7, 2018. On May 17, 2018, Seattle City
11 Light identified Afrika Red as a utility customer at **7721 20th Avenue Southwest**. Afrika
12 Red is the registered owner of the **silver Mercedes S55 (BAL1564)** driven by Street.

13 213. On May 21, 2018, investigators saw both the **silver Audi A4 (BHH5506)**
14 and the **silver Mercedes S55 (BAL1564)** parked in the driveway at **7721 20th Avenue**
15 **Southwest**.

16 **DONNIE CHEATHAM**

17 **Associated Locations: 1811 East Howell Street, Seattle, Washington**

18 **Associated Vehicles: No associated vehicles sought**

19 214. Based upon intercepted calls, I believe Charles Cheatham supplies Donnie
20 Cheatham with cocaine and marijuana. Discussed below, Donnie Cheatham was
21 identified using TT44 for which a tracking warrant was authorized. GPS data indicated
22 TT44 was often in the vicinity of **1811 East Howell Street**, Seattle, Washington during
23 overnight hours. During physical surveillance, investigators saw Donnie Cheatham arrive
24 at the residence at approximately the same time as TT44 arrived, indicating that TT44
25 traveled with him. Based upon voice recognition, investigators also believe Donnie
26 Cheatham also used 206-698-1944.

27 ///

28 ///

1 *November 2017: Donnie Cheatham is supplied a "baby" (4½ ounces of cocaine)*

2 215. On November 6, 2017, **TT15** called 206-698-1944 (session 478). I
3 recognized the voice of the caller as that of Donnie Cheatham from the calls discussed
4 below. Donnie Cheatham said, "Let me get right." Charles Cheatham said, "Huh?"
5 Donnie Cheatham said, "This is D" (Donnie). Charles Cheatham said he "would have to
6 do it tomorrow or something."

7 216. On November 8, 2017, **TT15** called TT44 used by Donnie Cheatham
8 (session 867). During the call, Charles Cheatham said, "D" (Donnie) "My fault family.
9 I'm ready now. I got the L" (Lamont Reynolds, discussed below) "come see you if you
10 ready." Donnie Cheatham said, "I had grabbed one of them already." "I got twenty eight
11 for you right now." "I need to" "shoot you twenty eight and shoot you regular change you
12 know." Charles Cheatham said, "You can get that and you just owe me the balance." "I'll
13 tell him, so answer your phone." Based upon my training and experience, I believe
14 Donnie Cheatham was asking to be supplied by Charles Cheatham and had owed drug
15 proceeds to provide to Charles Cheatham.

16 217. **TT15** called (session 881) TT35 used by Lamont Reynolds. Charles
17 Cheatham said, "There's a" "Sutton Suites." "Pull into the second driveway and go all the
18 way to the back." Reynolds affirmed. Charles Cheatham said, "Marvelous is going to
19 meet you at the barbershop. He just wants a single. And then Little P is in the CD. You
20 know he can't drive. He wanted the baby" (four-and-a-half ounces of cocaine). "My other
21 partner didn't answer back." Based upon my training and experience, I believe that
22 Cheatham was directing Reynolds to make a series of drug transactions on his behalf. I
23 know that Donnie Cheatham lives in the Central District ("CD") and Cheatham was
24 directing Reynolds to bring "Little P" (Donnie Cheatham's middle name is Prince) the
25 "baby." I have spoken with people that are personally familiar with Donnie Cheatham
26 and am aware that he is blind, explaining why Charles Cheatham said that Donnie
27 Cheatham can't drive.
28

1 218. Later, **TT15** called TT35 (session 893). Cheatham told Reynolds, "He said
 2 he's out there in the green coat." Reynolds affirmed and began speaking to someone in
 3 the background of TT35 (discussed above, this was the deal with Street). Cheatham
 4 continued, "Marvelous is at the barbershop for the single and then Little Donnie is at"
 5 "the house at Nineteenth and Madison, at Nineteenth and Howell." This is the location of
 6 Donnie Cheatham's residence at **1811 East Howell Street**.

7 219. Approximately half an hour later, **TT15** called TT35 (session 904).
 8 Cheatham gave directions to **1811 East Howell Street**, "Nineteenth and Howell on the
 9 hill. On the left hand side." Reynolds asked, "Grandma's house." Cheatham affirmed and
 10 said, "When he get out, you know, the baby for him." "Oh." "Single ones for him." "Just
 11 take the five of there, I guess you probably have to split it for him because I forgot."
 12 Based upon my training and experience, I believe that Charles Cheatham was directing
 13 Reynolds to split the baby or provide single ounce units to Donnie Cheatham because he
 14 is blind.

15 220. Approximately ten minutes later TT35 called **TT15** (session 907).
 16 Cheatham told Reynolds to knock on the door. **TT15** then called TT44 (session 908).
 17 Charles Cheatham said, "DC." Donnie Cheatham responded, "Yeah." Charles Cheatham
 18 said, "L's at the door."

19 ***February 2018: Donnie Cheatham obtains marijuana***

20 221. During interception of **TT46** used by Charles Cheatham, investigators
 21 recognized the voice of Donnie Cheatham using 206-698-1944. Charles Cheatham and
 22 Donnie Cheatham continued to have drug-related conversations during the interception
 23 period. For example, on February 21, 2018, **TT46** received a call from 206-698-1944
 24 (session 660). Donnie Cheatham asked, "What he say about that tree?" (marijuana).
 25 Cheatham said, "I'm about to call him."

26 222. **TT46** called 206-698-1944 back. Charles Cheatham said, "This" dude "is
 27 trying to charge me twenty one, D." Donnie Cheatham sighed and said, "Alright."
 28 Charles Cheatham asked, "What you wanna do?" Charles Cheatham said, "I told I be

1 having two thousand so ..." Charles Cheatham told someone in the background, "We
2 need two thousand." Based upon my training and experience, I believe Charles Cheatham
3 was negotiating for a pound of marijuana for \$2,000 on Donnie Cheatham's behalf. Later,
4 **TT46** called 206-698-1944. Charles Cheatham asked, "Where you at D?" Donnie
5 Cheatham said, "I'm at the house." Charles Cheatham said, "I'm outside. I'm about to
6 come up to the porch."

7 ***February 2018: Surveillance of TT44***

8 223. On February 22, 2018 at approximately 2:30 p.m., GPS data indicated
9 TT44 was not in the area of **1811 East Howell Street**, Seattle, Washington. Investigators
10 went to **1811 East Howell Street**. At approximately 3:07 p.m., investigators saw Donnie
11 Cheatham, identified from his Washington identification card, arrive as the front
12 passenger in a gray passenger vehicle. The vehicle dropped Donnie Cheatham off, and
13 Donnie Cheatham walked to the front door. Donnie Cheatham appeared to use keys to
14 enter the residence. GPS data indicated that TT44 also arrived in the vicinity of the
15 residence.

16 ***May 2018: Surveillance at 1811 East Howell Street***

17 224. On May 2, 2018, investigators saw Donnie Cheatham come out of the front
18 door of the house with a female, get into a vehicle and depart.

19 ***Most Recently***

20 225. A review of currently available toll data indicates TT70 used by Charles
21 Cheatham has been in contact with 206-698-1944 as recently as May 9, 2018. Donnie
22 Cheatham currently lists **1811 East Howell Street** on his Washington identification card.

23 226. On May 21, 2017, investigators saw a gold Cadillac arrive and park in front
24 of **1811 East Howell Street**. The passenger got out and walked to the front door of **1811**
25 **East Howell Street**. Investigators saw Donnie Cheatham came out of the front door with
26 a backpack and greet the passenger. Donnie Cheatham then locked the front door with a
27 key and walked to the Cadillac with the passenger. Both got in and the Cadillac departed.
28

1 Almost an hour later, the Cadillac returned and Donnie Cheatham got out of the vehicle
2 and went into the house.

3 **VENTOE WOODS**

4 **Associated Locations: 21644 29th Avenue South, Apartment C**
5 **Des Moines, Washington**

6 **Associated Vehicles: Blue Lexus GS (BEU1152)**

7 227. TT42 is subscribed to "Yaudica" Woods using address 12633 69th Avenue
8 South, Unit 12, Seattle, Washington. This is the address listed on Ventoe Woods's
9 driver's license. A search of Facebook for TT42 reveals that the phone number is
10 associated with a Facebook page for "Yau Yaudica." The profile included a partial
11 picture of the profile owner. After comparing a booking and driver's license photograph
12 of Ventoe Woods with the profile picture, I believe that the subject depicted in the
13 Facebook profile is Ventoe Woods. Investigators obtained a tracking warrant for TT42.
14 GPS data was not precise enough for investigators to do any meaningful surveillance.
15 However, even with the wide margin of error, TT42 was often generally in the vicinity of
16 **21644 29th Avenue South, Apartment C, Des Moines, Washington** during overnight
17 hours.

18 ***November 2017: Drug-related calls with Cheatham***

19 228. On November 3, 2017, Cheatham using **TT15** received a call from Woods
20 using TT42 (session 42). Woods greeted Cheatham by saying, "Yau! Yau! Yau! Yau!"
21 Woods said, "I need to see you. I'm right here on in Skyway." Cheatham said, "I'm at the
22 mall. You want to meet me at the mall. You come right now, I'll wait on you." Woods
23 said he would meet Cheatham there. During a follow up call (session 44), Woods stated
24 he was at the mall. Cheatham gave his location in the mall. Based upon my training and
25 experience, I believe that the purpose for their meeting was for Woods to obtain
26 controlled substances from Cheatham.

27 229. On November 20, 2017, **TT15** received a call from TT42 (session 2297).
28 Woods said he was "down south" and had to run to his house "on two sixteenth" (South

1 216th Street is the cross street for **21644 29th Avenue South, Apartment C**, Des
2 Moines, Washington). Cheatham said to meet at the "Smoke Shop" and asked, "What we
3 talking about, the same thing like we did before?" Woods said, "Just one this time."
4 Based upon my training, experience, and knowledge of this investigation, I believe that
5 Woods requested one unit of cocaine.

6 ***April 2018: Surveillance at 21644 29th Avenue South, Apartment C***

7 230. On April 24, 2018, investigators saw Woods, identifying him from his
8 driver's license photograph, standing next to a **blue Lexus GS (BEU1152)** in the parking
9 lot of 21644 29th Avenue South, Des Moines, Washington. The Lexus was registered to
10 the address at **Apartment C**. Investigators saw Woods walk from the Lexus and into
11 **Apartment C**.

12 ***May 2018: Surveillance at 21644 29th Avenue South, Apartment C***

13 231. On May 14, 2018, investigators saw Woods arrive in the **blue Lexus GS**
14 **(BEU1152)** and park in a spot marked with the letter C. Investigators saw Woods walk
15 into **21644 29th Avenue South, Apartment C**. A few minutes later, Woods looked out
16 the blinds at the investigators' vehicle. On May 19, 2018, investigators saw Woods
17 driving the **blue Lexus GS (BEU1152)** and arriving at a church in Renton, Washington.
18 Woods walked towards the church and returned in about ten minutes. Woods then
19 departed in the Lexus.

20 ***Most Recently***

21 232. A review of currently available toll data indicates TT70 used by Cheatham
22 has been in contact with TT42 as recently as May 5, 2018. On May 11, 2018, PSE
23 identified Brittney Watkins as a utility customer at **21644 29th Avenue South,**
24 **Apartment C**. Watkins is also the registered owner of the **blue Lexus GS (BEU1152)**
25 driven by Woods.

26 233. On May 21, 2018, investigators saw the **blue Lexus GS (BEU1152)** at
27 **21644 29th Avenue South**. While there, investigators saw someone briefly look out from
28 behind the drapes for a window to **Apartment C**.

1 **MICHAEL YOUNG**

2 **Associated Locations: 24038 62nd Way South, Apartment 19-105**
 3 **Kent, Washington**

4 **Associated Vehicles: Maroon Lexus LS (AVP0284)**

5 234. Based upon intercepted calls, I believe Cheatham supplies Young with
 6 controlled substances, and Young is a source of supply for large amounts of marijuana.
 7 Discussed below, Michael Young was identified using TT30 for which a tracking warrant
 8 was authorized. GPS data indicated that TT30 was often in the vicinity of **24038 62nd**
 9 **Way South, Building 19, Apartment 105**, Kent, Washington during overnight hours.
 10 Discussed below, investigators conducted physical surveillance with GPS data for TT30,
 11 locating Young at various locations indicated by the GPS data.

12 ***November 2017: Cheatham and Young discuss fifty pounds of marijuana***

13 235. On November 4, 2017, Cheatham using **TT15** received a call from Michael
 14 Young using TT30 (session 205). During the call, Cheatham asked, "You got some
 15 glue?" (a reference to Gorilla Glue, a strand of marijuana). Young responded, "Yeah" and
 16 asked "What you want to do man?" Cheatham asked, "What you talking about for it."
 17 Young said, "I already told you." Cheatham responded, "Oh, shit, I forgot." Young
 18 replied, "A hundred dollars cheaper that what you was already paying." Cheatham said,
 19 "I'm cool." "I just told you eighteen, I get that shit for sixteen."

20 236. Young replied, "You didn't even tell me eighteen." Cheatham asked, "No,
 21 what I tell you?" Young said, "No. You see, you're playin' a game with yourself. You
 22 told me, you was paying sixteen, and I told you I'll give it to you for fifteen." "So there's
 23 no way you go buying nothing from nobody else." Cheatham said, "I was checking your
 24 temperature." "How many you got. If it's the real." Young said, "I got like fifty at least."

25 237. Cheatham asked, "How much are you going to charge me for ten? Thirteen
 26 a piece?" Young said, "I'm charging you fourteen hundred, or if you get all the fifty of
 27 these mothafuckas, I'll charge you thirteen hundred." Cheatham said, "If I get fifty" "I be
 28 for twelve hundred or a thousand" "what the fuck you talking about?" After some

1 additional discussion, Cheatham asked, "Where you at. Let me see it. Let me see the
2 whole pound would look like." The two agreed to meet.

3 238. Based upon my training and experience, I believe that Young is a source of
4 supply for marijuana and had access to fifty pounds of it. I believe that Young was
5 offering pounds of marijuana to Cheatham for \$1300 to \$1400 per pound. Cheatham
6 wanted to see the quality of the marijuana that Young had access to.

7 *November 2017: Young requests two units of suspected narcotics*

8 239. On November 5, 2017, **TT15** received a call from TT30 (session 321).
9 During the call Young asked, "Is it still all good or what?" Cheatham responded, "Yeah. I
10 got a couple." Young asked, "Where you want me to come to exactly?" Cheatham said,
11 "At Tahoma Mart." Young asked, "Over there in Fzife?" (Fife). Cheatham said, "Yeah."
12 Young told Cheatham, "Ok with like two of them probably. I'm going to call you right
13 back. I'm going to text you and let you know if it's one or two."

14 *November 2017: Surveillance of TT30*

15 240. On November 29, 2017, GPS data indicated TT30 was in the vicinity of
16 45th Avenue and South Willow Street in Seattle. Investigators went to that location and
17 observed the **maroon Lexus LS (AVP0284)** parked in front of 4435 South Willow
18 Street. This is the address listed on Michael Young's driver's license. The Lexus had dark
19 tint and investigators could see there was a person in the driver's seat. The Lexus
20 departed and investigators lost sight of the vehicle. GPS data indicated TT30 departed as
21 well.

22 241. Later, GPS data indicated TT30 was in the vicinity of the Silver Dollar
23 Casino in SeaTac. Investigators went there and located the Lexus parked unoccupied in
24 the parking lot. Investigators observed a male matching the physical description of
25 Young get into the driver's seat of the Lexus and leave the area. GPS data indicated TT30
26 also left the area. Throughout the day, investigators continued to conduct physical
27 surveillance in conjunction with GPS data for TT30. TT30 traveled to various locations
28 where the Lexus was seen as well.

1 242. On November 30, 2017, investigators established physical surveillance in
 2 the area of the Silver Dollar Casino located in SeaTac. GPS data indicated that TT30 was
 3 in the vicinity. There, investigators located the **maroon Lexus LS (AVP0284)**.
 4 Investigators observed a male and female exit the casino and get into the Lexus and
 5 depart. GPS data indicated TT30 also departed. Investigators later located the Lexus
 6 parked at the Riverside Casino in Tukwila. GPS data showed that TT30 was also in the
 7 vicinity. Investigators observed the male and female exit the casino and get into the
 8 Lexus. They traveled across the street to the 7-Eleven before departing southbound. GPS
 9 data showed that TT30 departed as well.

10 243. Investigators took numerous photographs during the above-discussed
 11 surveillance operations. Comparing the identification card photograph of Michael Young
 12 with the photographs taken of the driver of **maroon Lexus LS (AVP0284)**, investigators
 13 identified the driver as Young.

14 ***January 2018: 24038 62nd Way South, Building 19, Apartment 105***

15 244. GPS data indicated TT30 was regularly located in the vicinity of **24038**
 16 **62nd Way South, Building 19**, in Kent, Washington. Investigators conducted
 17 surveillance there on January 18, 2018. Investigators observed the **maroon Lexus LS**
 18 **(AVP0284)** pull into the apartment complex and park behind building 19. Investigators
 19 observed Young (identified by his driver's license photograph) get out of the Lexus and
 20 walk behind the west side of building 19.

21 245. On January 31, 2018, at approximately 9:25 p.m., investigators saw Young
 22 arrive at **24038 62nd Way South, Building 19** in the **maroon Lexus LS (AVP0284)**.
 23 Young got out of the driver's seat and an unknown female got out of the front passenger
 24 seat. Investigators observed Young go into **Apartment 105**.

25 ***May 2018: 24038 62nd Way South, Building 19, Apartment 105***

26 246. On May 7, 2018, investigators saw the **Maroon Lexus LS (AVP0284)** in
 27 the parking lot of **24038 62nd Way South, Apartment 19-105**. Investigators saw Young
 28 come out of **Apartment 19-105** and walk to the Lexus. Young departed in the vehicle.

1 On May 16, 2018, investigators again saw Young come from **Apartment 19-105** and
 2 depart in the **Maroon Lexus LS (AVP0284)**.

3 ***Most Recently***

4 247. A review of currently available toll data indicates **TT24** used by Michael
 5 Davis has been in contact with TT30 as recently as April 30, 2018. On May 21, 2018,
 6 investigators saw Young exit **24038 62nd Way South, Apartment 19-105** and depart in
 7 the **Maroon Lexus LS (AVP0284)**.

8 **CLEOPHUS SHEPARD**

9 **Associated Locations: 1410 Southwest 116th Street, Seattle, Washington**

10 **Associated Vehicles: Black Lexus RX (BEP5598)**
 11 **Brown Buick LeSabre (AVN4805)**
 12 **Beige Buick Century (BEN1663)**

13 248. Based upon intercepted calls, I believe Cheatham supplies Shepard with
 14 controlled substances. Discussed below, Cleophus Shepard was identified using TT37 for
 15 which a tracking warrant was authorized. Investigators identified Shepard using TT37
 16 both by conducting physical surveillance contemporaneously with intercepted calls and
 17 locating Shepard at various locations indicated by GPS data for TT37. GPS data indicated
 18 that TT37 was often in the vicinity of **1410 Southwest 116th Street, Seattle, Washington**
 19 during overnight hours.

20 ***November 2017: Drug transaction between Shepard and Cheatham***

21 249. On November 10, 2017, Cheatham using **TT15** called Shepard using TT37
 22 (session 1136). Cheatham and Shepard attempted to agree on a meeting location and
 23 eventually Cheatham stated, "Real simple for you ... meet me at Burger King. In the
 24 parking lot of Burger King and 7-11." Shepard agreed. Investigators went to a Burger
 25 King located near a 7-Eleven store in south Seattle.

26 250. Less than ten minutes later, investigators saw a black Lincoln (BHS9481)
 27 parked in the parking lot of 7-Eleven next to the Burger King. According to Alamo, the
 28 Lincoln was rented to Cheatham. Shortly thereafter, investigators observed a **black**

1 **Lexus RX (BEP5598)** registered to Shepard arrive and park. Shepard (identified from his
2 driver's license photograph) got out of the Lexus, walked to the Lincoln, and spoke to
3 Cheatham through an open window. Both departed shortly thereafter in their respective
4 vehicles. Based upon my training and experience, I believe Cheatham and Shepard
5 conducted a drug transaction.

6 ***December 2017: Surveillance of TT37***

7 251. In the late evening hours of December 12, 2017, GPS data indicated that
8 TT37 was in the vicinity of **1410 Southwest 116th Street**, Seattle, Washington. There
9 investigators located the **black Lexus RX (BEP5598)** parked in the driveway as well as a
10 **beige Buick Century (BEN1663)** also registered to Shepard parked at the residence.

11 252. On December 13, 2017, GPS data indicated that TT37 was in the vicinity of
12 The Lighthouse for the Blind in South Seattle. Investigators went to that location and saw
13 the **beige Buick Century (BEN1663)** parked nearby. Investigators saw Shepard
14 (identified from his driver's license photograph) and another subject come from the
15 business and get into the Buick. About an hour later, both went back into the business. A
16 few minutes later, Shepard returned to the Buick, drove around the corner, picked up a
17 passenger, and departed.

18 253. Later, GPS data indicated TT37 was in the vicinity of Fred Meyer in
19 Burien. Investigators went to that location and found the Buick. Investigators saw
20 Shepard get into the Buick and depart alone in the vehicle. Investigators lost sight of the
21 Buick. Investigators went to **1410 Southwest 116th Street**. There, investigators saw the
22 **beige Buick Century (BEN1663)** and the **black Lexus RX (BEP5598)** parked in the
23 driveway.

24 ***February 2018: Drug transaction with Cheatham***

25 254. On February 26, 2018, **TT46** called TT37 (session 1072). Shepard said he
26 would get off work at 3:30 p.m., and Cheatham asked to meet at "Green Tree" in
27 "Skyway." Shepard stated, "Two dollars." Cheatham responded, "Ok." "You know I got
28 that" "shit that getting ready. You're gonna get your whole twenty eight. That's ready too

1 if you want that too.” Shepard declined. Based upon my training and experience, I
 2 believe that Cheatham was offering Shepard either a whole ounce (28 grams) of cocaine
 3 or a whole kilogram of cocaine for \$28,000. Investigators went to the Green Tree
 4 Apartments in Skyway.

5 255. Later, TT37 called **TT46** (session 1083). Shepard said he was on the way.
 6 Shortly thereafter, investigators located the **black Cadillac Escalade (BHY8148)** parked
 7 very close to the Green Tree Apartments. Investigators saw a **brown Buick LeSabre**
 8 **(AVN4805)** registered to Shepard arrive and park next to the Escalade.

9 256. Shepard got out of the LeSabre and met Cheatham. Both were identified
 10 from their driver’s license photographs. Both got into the Escalade. Shortly thereafter,
 11 both got out of the Escalade. Cheatham walked into the nearby apartments. Shepard
 12 departed in the LeSabre.

13 ***May 2018: Surveillance at 1410 Southwest 116th Street***

14 257. On May 4, 2018, investigators saw a **black Lexus RX (BEP5598)**, a **beige**
 15 **Buick Century (BEN1663)**, and a **brown Buick Lesabre (AVN4805)** parked in the
 16 driveway of **1410 Southwest 116th Street**. These vehicles were all registered to Shepard.
 17 Investigators saw Shepard arrive driving a **black and tan Mercury Cougar (AIP0343)**
 18 also registered to Shepard. Investigators saw Shepard walk into the residence.

19 258. On May 13, 2018, investigator saw Shepard depart **1410 Southwest 116th**
 20 **Street** driving the **beige Buick Century (BEN1663)**.

21 ***Most Recently***

22 259. A review of currently available toll data indicates TT70 used by Cheatham
 23 has been in contact with TT37 as recently as May 8, 2018. On May 21, 2018,
 24 investigators saw Shepard standing inside the open front door of **1410 Southwest 116th**
 25 **Street**.

26 ///

27 ///

1 **LUIS PEREZ-CRUZ**

2 **Associated Locations:** **1618 North 26th Street, Apartment 205**
 3 **Mount Vernon, Washington**

4 **Associated Vehicles:** **Black Ford Explorer (A3421042)**

5 260. Discussed below, Luis Perez-Cruz was identified using TT54 which was
 6 the subject of a tracking warrant. Based upon intercepted calls, Perez-Cruz is a multiple-
 7 kilogram cocaine source of supply for Cheatham.

8 ***February 2018: Perez-Cruz and Cheatham discuss multi-kilograms of cocaine***

9 261. On February 20, 2018, Cheatham using **TT46** received a call from Perez-
 10 Cruz using TT54 (session 587). During the call, Cheatham and Perez-Cruz referred to
 11 each other as "Amigo" (friend). Perez-Cruz said, "This is new number." I know based on
 12 my training and experience that drug traffickers frequently change cell phones in an
 13 attempt to defeat law enforcement. Cheatham said, "I'll hit you couple hours amigo.
 14 Good ones. Good ones." Perez-Cruz said, "Yeah. Good ones. I'll check right now." "I got
 15 it. I'll check right now. I'll call you and let you know." Cheatham said, "I need five. Five.
 16 Call me. No less. Muthafucka." During this call, I believe Perez-Cruz provided Cheatham
 17 with his new cell phone number. Cheatham then indicated he wanted "five" "good ones"
 18 (five kilograms of quality cocaine).

19 262. Approximately half an hour later TT54 called **TT46**. Perez-Cruz said, "I
 20 open one right now." "It is coming a little solid. But not much. You know. When you
 21 touch, it broken easy. But it come in chunk." Cheatham said, "I don't want that shit that
 22 fall apart." "I want some solid shit." "My people don't like it. They think something
 23 wrong." "I want solid one. You got solid ones, I be ready in the next hour." Perez-Cruz
 24 said, "It's like that." Cheatham said, "You check. And I don't want your boy. I want you.
 25 I don't want nobody else coming. Fuck that. Last time you did that, I don't like that
 26 man." Cheatham continued, "It gotta be solid, man. I don't want that shit crumble. I don't
 27 like that." Based on my training and experience, I believe Perez-Cruz and Cheatham were
 28

1 discussing the quality of the cocaine. Cheatham was objecting to buying cocaine that was
2 too crumbly and soft.

3 263. On February 21, 2018, TT54 called **TT46** (session 688). Cheatham said,
4 "Yesterday, I didn't call you back." "My kid had man had basketball practice." "I'll be
5 ready tomorrow." "Still two-five right. Get five" (5 kilograms of cocaine for \$25,000 per
6 kilogram). Perez-Cruz said, "Two-five-three." (\$25,300 per kilogram). Cheatham said,
7 "No muthafucka. I told you I give you two-five. Now you go up today. No muthafucka."
8 Perez-Cruz said, "Just call tomorrow." Based on my training and experience, I believe
9 Perez-Cruz was asking for \$25,300 per kilogram, and Cheatham was refusing to pay
10 more than \$25,000.

11 264. On February 25, 2018, TT54 sent a text message (session 1026) to **TT46**
12 reading, "I have new now" (new cocaine). **TT46** responded, "No duff." (Again, a
13 reference to cocaine that was solid, not crumbly or soft). TT54 replied, "No."

14 265. In summary, based upon my training and experience, I believe that in the
15 foregoing intercepted calls/texts, Cheatham was negotiating to purchase five kilograms of
16 cocaine for \$25,000 a kilogram from Perez-Cruz. Based upon the description of the
17 cocaine provided by Perez-Cruz, I believe that Cheatham was not satisfied with its
18 quality because the kilogram brick of cocaine crumbled upon touching it.

19 ***February 28, 2018: Surveillance of TT54***

20 266. On February 28, 2018, GPS data indicated that the phone was in the
21 vicinity of a strip mall in Mount Vernon, Washington. Investigators observed a gray Ford
22 Explorer with no license plate at that location. In place of the license plate, there was a
23 car dealership advertisement, as if the vehicle was recently purchased. Later, GPS data
24 showed that TT54 was located at an apartment complex in Mount Vernon at **1618 North**
25 **26th Street**. There, investigators also located the gray Ford Explorer parked in parking
26 spot F135. Investigators saw the gray Ford Explorer depart.

27 267. GPS data indicated that TT54 traveled to Bellevue Square in Bellevue,
28 Washington. Investigators located the gray Ford Explorer unoccupied in the parking

garage. Investigators noted the Vehicle Identification Number (VIN) on the dash of the vehicle. Investigators waited until the occupants returned. Eventually an adult male (Perez-Cruz), an adult female, and child returned to the gray Ford Explorer. Investigators took photographs.

268. When the gray Ford Explorer departed, investigators followed the vehicle to an IHOP restaurant near Southcenter in Tukwila, Washington. The family went into the restaurant. GPS data for TT54 showed that the phone was in the vicinity as well.¹⁸

April 2, 2018: Perez-Cruz travels to California then returns five days later

269. On the evening of April 2, 2018, GPS data for TT54 indicated that the phone departed the Mount Vernon apartment complex and began traveling southbound along Interstate 5 and into California. I know, based on my training and experience, that California is a source state for cocaine that is smuggled over the border into the United States from Mexico, and that much of the cocaine sold in Washington State transits up through California.

270. On April 3, 2018, and April 4, 2018, GPS data for TT54 indicated that the phone was in the vicinity of a Best Western hotel across from Disneyland during overnight hours. On the morning of April 5, 2018, investigators in California located the gray Ford Explorer (BIV3972) at a Denny's restaurant next to the Best Western.

271. On April 7, 2018, TT54 began traveling northbound along Interstate 5. Just past midnight on April 8, 2017, GPS data for TT54 indicated that the phone was in the vicinity of a Chevron gas station near Sacramento, California. Afterwards, investigators stopped receiving GPS data for the TT54.

///

¹⁸ A later check of the VIN of the gray Ford Explorer showed that the vehicle had been registered to Leonardo Martinez with Washington license plate BIV3972. I compared photographs taken at Bellevue Square with the Washington driver's license photograph of Leonardo Martinez. Based upon this comparison, I initially identified the driver of the gray Ford Explorer as Leonardo Martinez. Based on further information and additional photographs as described below, I later determined that this initial identification was incorrect, and the driver was in fact Luis Perez-Cruz.

1 272. Later that morning, investigators staged in Salem, Oregon in an attempt to
 2 locate the Explorer on Interstate 5. At approximately 11:35 a.m., investigators spotted the
 3 Explorer northbound on Interstate 5. Investigators followed the vehicle until it stopped at
 4 a Chevron gas station in Ridgefield, Washington. TT54 again began providing GPS data.
 5 The GPS data indicated that the phone was in the same vicinity at that time. When the
 6 Explorer departed, it continued its travel on northbound Interstate 5.

7 273. At approximately 1:50 p.m., investigators directed marked patrol units to
 8 stop the vehicle in Chehalis, Washington, at the intersection of Interstate 5 and Highway
 9 12. Perez-Cruz, identified after presenting a Mexico driver license, was the driver of the
 10 vehicle. The registered owner, Leonardo Martinez, was in the back seat. The vehicle was
 11 also occupied by an adult female, the same one photographed with Perez-Cruz on
 12 February 28, 2018, and two children. Officers asked Martinez, the registered owner of the
 13 Explorer, for consent to search the vehicle. Martinez indicated that he could not speak
 14 English. Officers asked Perez-Cruz permission to search the vehicle. Perez-Cruz spoke in
 15 Spanish to Martinez. Perez-Cruz then informed officers that Martinez was giving them
 16 permission to search the vehicle.

17 274. Prior to the search, a police drug dog examined the Explorer. The drug
 18 dog¹⁹ indicated a positive alert to the odor of narcotics coming from the vehicle.
 19 Investigators conducted a search of the vehicle, but did not located readily accessible
 20 contraband. Investigators seized the Explorer and obtained a search warrant for a more
 21 thorough search. During the subsequent search, investigators did not find any contraband
 22

23 ¹⁹ Det. Troy Swanson applied K-9 Belle to the vehicle. In March 2017, K-9 Belle and Det. Swanson completed the
 24 state mandated requirement of 200 hours of canine narcotics specific training and met the canine performance
 25 standards set by the Washington Administrative Code (W.A.C.) for the Narcotic Dog Handler. The training
 26 consisted of over 240 hours of training in the classroom as well as practical applications, which covered all areas
 27 specified by W.A.C. K-9 Belle and Det. Swanson were certified as a team by the Washington State Police Canine
 28 Association (WSPCA). The WSPCA is an organization with voluntary membership to improve training and
 effectiveness of canine teams statewide. The WSPCA certification is also voluntary with more stringent standards
 than the state requirement. The substances trained on by the team are cocaine, heroin, methamphetamine and
 marijuana/hashish. Det. Swanson maintains both training logs and field activity/application reports. Both are
 available for review upon request. At this time the team has found over 500 narcotics substance training aids. K-9
 Belle is trained to detect the presence of marijuana, heroin, methamphetamine, and cocaine.

1 in the Explorer. The Explorer was turned over to a third party at the request of Martinez,
2 the registered owner. I know, based on my training and experience, that trained drug
3 detection dogs will alert on the residual odor of controlled substances in a container,
4 location, or vehicle for a period of time after the drugs have been removed

5 275. Investigators reviewed police body camera footage from the stop of the
6 Explorer on April 7, 2018. Comparing the photographs taken on February 28, 2018, with
7 the body camera footage, investigators determined that Perez-Cruz was the subject
8 photographed on February 28, 2018, and the female photographed with him was the front
9 seat passenger of the Explorer during the stop. Perez-Cruz has a distinctive tattoo on his
10 left hand.

11 *May 2018: Surveillance at 1618 North 26th Street*

12 276. On May 7, 2018, investigators saw a **black Ford Explorer (A3421042)**
13 parked at **1618 North 26th Street** in spot F135. This was the same spot investigators saw
14 the Ford Explorer subject to the discussed search warrant was parked in on February 28,
15 2018.

16 *Most Recently*

17 277. On May 23, 2018, investigators saw a black Ford Explorer with no license
18 plates arrive at **1618 North 26th Street**, Mount Vernon, Washington. During tracking of
19 TT54, the phone was regularly in this vicinity overnight. Investigators saw a **black Ford**
20 **Explorer (A3421042)** with a temporary tag in the rear window. The check of the tag
21 number revealed that the Explorer was registered to Leonardo Martinez with VIN
22 1FM5K8GT2HGE00414.

23 278. Investigators saw Perez-Cruz get out of the driver's seat of the Explorer and
24 recognized him from photographs of Perez-Cruz. Investigators could see the tattoo on his
25 hand. Investigators also saw the same female from the photographs and traffic stop get
26 out of the Explorer. Investigators watched Perez-Cruz walk up the stairs to **1618 North**
27 **26th Street, Apartment 205** and use a key to open the apartment door. He was followed
28 by the female and a child.

TIFFANY YOUNGER

Associated Locations: 2710 South 256th Place, Apartment C
Kent, Washington

Associated Vehicles: Brown GMC Yukon (BAE9909)

279. Investigators believe that Tiffany Younger uses 206-476-5301 which is subscribed to her. Younger also provided **2710 South 256th Place, Apartment C**, Kent, Washington as her address to T-Mobile. Younger also lists this address on her identification card. Based upon intercepted calls and surveillance observations, I believe that Cheatham uses this apartment as a stash location for his drugs and money.

280. Discussed in the sections above regarding Michael Safford and Alonzo Baggett, Cheatham was seen going to **2710 South 256th Place, Apartment C** prior to his drug transactions with the respective subjects. Additionally, intercepted calls indicated Younger has full knowledge of Cheatham's activities at her apartment.

November 8, 2017: Cheatham directs Younger to make suspected controlled substance available to Lamont Reynolds

281. On November 8, 2017, Cheatham using **TT15** called Younger using 206-476-5301 (session 849). Cheatham asked where Younger was. Younger replied, "At the house." Cheatham said, "I need to call L" (Lamont Reynolds) "tell him to come over there to get, look in your and see is there only two big ones in there?" Younger asked, "Are you out of town?" Cheatham said, "Yes." Younger said, "There's two." Cheatham said, "The one that looks open" "L is coming over there to get that." Younger said, "Yeah, that's all that's in there is two." "The one that looks open." "Not the one with the writing on it." Cheatham said, "Uh uh. It looks like the one that's all the way together." "I will see if L will come by and get that." Based upon my training and experience, I believe that Cheatham directed Younger to locate controlled substances stashed at her apartment and provide them to Reynolds when he arrived.

///

///

March 3, 2018: Cheatham directs Younger to make stored drugs available

282. On March 3, 2018, Cheatham using **TT46** called Younger using 206-476-5301 (session 1459). Cheatham asked if Younger was at home. Younger said she was. Cheatham said he was about to "pull up there in about like seven minutes." Cheatham asked for Younger to "look in that bag" and "hand me two" of "them things." "The ones that's" "sealed." Younger said, "Ok." Cheatham said, "It's in your closet." Based upon my training and experience, Cheatham was directing Younger to make two units of drugs available for Cheatham to pick up.

May 2018: Surveillance at 2710 South 256th Place, Apartment C

283. On May 10, 2018, investigators saw a **brown GMC Yukon (BAE9909)** registered to Younger parked in front of **2710 South 256th Place, Apartment C**. This address is also listed on the registration. Investigators saw Cheatham and another subject arrive in a silver Chevrolet Tahoe. The two walked up the stairs in the direction of **Apartment C**.

Most Recently

284. On May 8, 2018, PSE indicated that Younger was a utility customer at **2710 South 256th Place, Apartment C**. Younger currently lists this address on her driver's license. A review of currently available toll data indicates **TT70** used by Cheatham has been in contact with 206-476-5301 as recently as May 9, 2018.

285. On May 21, 2018, investigators saw Younger, identified by her Washington driver's license, come out of the stairwell that leads to **2710 South 256th Place, Apartment C**, get into the **brown GMC Yukon (BAE9909)** and depart.

LAMONT REYNOLDS

Associated Locations: 1412 69th Avenue East, Fife, Washington

Associated Vehicles: Gray Chevrolet Impala (BBK1418)

286. Discussed above, Lamont Reynolds distributed drugs on Cheatham's behalf on several occasions. Investigators identified Reynolds using **TT35** which was subject to a tracking warrant. **TT35** is also subscribed to Reynolds. Discussed in the section

1 regarding Barnett, Cheatham sent Reynolds to deliver drugs to Barnett and instructed
2 Barnett to look for the "gray Impala" (**gray Chevrolet Impala (BBK1418)**)

3 ***January 2018: Surveillance of TT35***

4 287. On January 3, 2018, GPS data indicated TT35 was in the vicinity of Dave
5 and Buster's restaurant at the outlet mall in Auburn, Washington. Investigators located a
6 **gray Chevrolet Impala (BBK1418)**²⁰ parked there. Reynolds departed alone in the
7 Impala. GPS data also indicated TT35 departed. Based upon the subscriber information,
8 intercepted calls where Cheatham calls Reynolds "L" (for Lamont), and this observation,
9 investigators believe Reynolds uses TT35. Discussed below, the Impala has been seen
10 parked at Cheatham's residence. Based upon overnight GPS data for TT35, investigators
11 believe Reynolds resides with Cheatham at **1412 69th Avenue East, Fife, Washington**.
12 This location and the Impala are discussed further below.

13 **CHARLES CHEATHAM**

14 **Associated Locations: 1412 69th Avenue East, Fife, Washington**

15 **Associated Vehicles: Black Cadillac Escalade (BHY8148)**

16 288. **TT15** and **TT46** used by Charles Cheatham were the subject of wiretaps in
17 November/December of 2017 (**TT15**) and February/March 2018 (**TT46**). Investigators
18 obtained authorization to wiretap **TT15** after intercepting Cheatham speaking with
19 Morgan over **TT1**. Cheatham stopped using **TT15** and started using **TT46** for which
20 investigators obtained authorization to wiretap after intercepting numerous drug-related
21 calls over **TT15**.

22 ***November 2017: Cheatham and Michael Davis obtain large amount of drugs***
23 ***from source of supply in the Los Angeles area***

24 289. On November 3, 2017, Cheatham using **TT15** received a call from Michael
25 Davis using **TT24** (session 34). Davis and Cheatham spoke about quantities and prices of
26 drugs. Cheatham told Davis he "needed five." Davis told Cheatham, "I done talk them to
27

28 ²⁰ This vehicle is registered to Galiysha Nesbitt, **2710 South 256th Place, Apartment C, Kent, Washington**
AFFIDAVIT OF RICHARD HUNTINGTON- 85

1 the twenty-three for you on those things and everything.” Cheatham said, “Okay, what
2 you want me to do give you the money again?” They continued to talk and Davis said,
3 “I’m trying to fill the order.” Davis continued on by saying he was trying to see “how
4 many blacks we getting and then if you want some of them squares. I got everything
5 talked down, what you need?” Cheatham told Davis, “I need to go and count up so I can
6 tell you everything on a precise number tonight.” “Because I still got two of those other
7 ones.” Davis asked Cheatham if he “still want some of them dark ones” from him.
8 Cheatham said, “Yeah, I’m gonna get like two of them for me.” Davis replied by saying
9 “So basically I’m gonna get four of them and then you just getting the two ... so that’s
10 six.”

11 290. Based upon my training and experience, I believe that when Cheatham told
12 Davis he “needed five,” Cheatham was telling Davis he wanted five kilograms of
13 cocaine. I believe that when Davis said, “I done talk them to the twenty-three for you on
14 those things and everything,” Davis was telling Cheatham that the price would be
15 \$23,000 per kilogram of cocaine. I believe that when Davis asked Cheatham “how many
16 blacks we getting and then if you want some of them squares. I got everything talked
17 down, what you need?” Davis was asking Cheatham how many kilograms of heroin and
18 cocaine he wanted. Based on my training and experience, I know the term “black” refers
19 to heroin and the term “squares” refers to kilograms of cocaine. I also know that \$23,000
20 dollars per kilogram of cocaine is consistent with the price of cocaine.

21 291. On November 4, 2017, **TT15** called **TT24** (session 165). Davis told
22 Cheatham, “I was just about to call California but I was already talking to” “Illinois
23 ‘cause Illinois is all over me ... they ready right now.” Davis went on to say that Illinois
24 told him that he wanted to go to California himself and wait on Davis there. Davis
25 continued, telling Cheatham that Davis had other people ready to throw their money in
26 for California too.

27 292. Based upon my training and experience, I believe that Davis was informing
28 Cheatham that he was calling a source of supply in California to arrange the transaction

1 of cocaine and heroin. I believe that Davis was referring to a person in Illinois when he
2 referred to "Illinois" and that person was ready to purchase the drugs as well.

3 293. On November 5, 2017, TT25 called **TT15** (session 407). I recognized the
4 voice of the user of TT25 as Davis's voice. Cheatham and Davis discussed prices of
5 different flights with different airlines. Davis said, "If you do try Ontario" "not LAX, it
6 would be cheaper that way too sometimes." Cheatham said, "But do you got to drive
7 from Ontario?" Davis responded, "So what." "It's like driving from" "Tacoma."
8 Cheatham stated, "We got to figure it out anyway." "We're basically leaving tomorrow."
9 The two also discussed booking a rental vehicle. The two then began speaking about a
10 third party.

11 294. Later that evening, **TT24** called **TT15** (session 438). Cheatham and Davis
12 confirmed that Davis was making airline reservations and Cheatham would reserve a
13 rental car and room in Los Angeles. Davis told Cheatham "I'm all over it. The car is
14 gone." Cheatham acknowledged and said, "As long as we outta here by twelve one
15 o'clock we gonna meet them there." Based upon my training and experience, I believe
16 that Davis sent a car from Washington to California to transport currency, and later,
17 based on observations discussed below, this same vehicle transported the drugs back to
18 Washington.

19 295. On November 6, 2017, **TT15** called **TT24** (session 467). Davis told
20 Cheatham that their flight was leaving at 11:21 a.m., and told Cheatham that he would
21 pick Cheatham up to go to the airport. According to American Airlines, Cheatham and
22 Davis boarded an 11:21 a.m. flight from Seattle-Tacoma International Airport to Los
23 Angeles International Airport on November 6, 2017.

24 296. Investigators obtained a tracking warrant to track **TT24** used by Davis.
25 Investigators began receiving data on November 7, 2017. Subsequent GPS data for **TT15**
26 and **TT24** indicated that the two telephones often traveled together to various parts of the
27 Los Angeles area.
28

1 297. On November 7, 2017, *TT15* received a call from *TT24* (session 679).
2 Cheatham told Davis "Yeah, I checked that shit, it was just average, it wouldn't, it
3 wouldn't all that so I didn't even fuck with that because, one, didn't what it was supposed
4 to and I tried another one and it took damn near thirty minutes for it to get heazy." Davis
5 said, "Oh, so you didn't even fuck with nothing or did you grab the one that you liked?"
6 Cheatham told Davis "No, I didn't even grab that because I'm like fuck that because they
7 all got the same symbol." Davis agreed and said "Right, yeah, you gonna have problems
8 with it later, I know."

9 298. Cheatham then told Davis, "He [unknown source of supply] said it's on, on
10 the back, he said he said he's not stop working tonight. He's gonna make the magic
11 happen. He said the dude got the two that he was talking about, two-seven but no, he said
12 he gonna get him down to two-five, he said they supposed to be fire and he's gonna do
13 double. So we're about to go by, we're about to go back downtown and go check into a
14 room, so we about to just go get a room and then, uh... let you all know where we at. If he
15 call tonight like I told him by twelve o'clock I'm out of here tomorrow. So, if it ain't
16 happening by then, or we don't dance right here then I'm out."

17 299. Davis told Cheatham, "Yeah, they trying to get greedy." "The other" guy
18 "told me he said he put me with the other boy. Remember the one boy who I was like, I
19 was telling you before? He really wanted the twenty seven?" Cheatham acknowledged,
20 and Davis continued, "Then they wanted to hand me out to one, one-o-eight for the four
21 and I was like, "man, then we get the five, fuck it, let me get the five for the...for the uh,
22 one twenty five, and he's like, c'mon." "I'm telling him right now" "I want--He, he
23 sayin" "twenty-six is the best he can do, this is the same boy, I'm like ... yeah um ... you
24 gave it me for twenty-five last time and I got five, I want six, at least. You see what I'm
25 saying?"

26 300. The conversation continued discussing quantities (kilograms) and pricing.
27 Davis said, "Before I wanted eight. This shit is, this shit is crazy. But, yeah, he's saying
28 he got that boy that I like that I know is the shit, but um ..." Cheatham said, "Two six"

1 and Davis continued "Yeah, basically that's what he's saying, that's the best he can do
2 for me, two-six." Cheatham told Davis, "I mean, that's up to you. If you dance, I'll
3 dance. Like I tell you, pay the extra dollar." They eventually agreed to meet at a location
4 to complete the transaction.

5 301. Later, **TT15** called **TT24** (Session 756). During the call Cheatham told
6 Davis, "Hey, the two are here, for the two-five. I need you to pull up. The two is here, for
7 the two-five." "You're like seven, six and we about twelve minutes away, if that. You
8 hear me?" Davis acknowledged and Cheatham went on to tell Davis to meet him at his
9 location. Davis agreed to meet with Cheatham.

10 302. On November 8, 2017, **TT24** called **TT15** (session 922). Davis asked
11 Cheatham "What is it looking like?" Cheatham told Davis "its counted out." Davis asked
12 Cheatham "I'm saying um ... man, send that pack out?" Cheatham responded, "Yeah, we
13 counting out were making sure everything is right."

14 303. Intercepted calls indicated that Cheatham and Davis were flying back to
15 Seattle that night. GPS data for **TT24** and **TT15** indicated that both telephones were at the
16 Los Angeles International Airport at approximately 11:00 p.m. on November 8, 2017.

17 304. On November 9, 2017, at approximately 2:25 a.m., investigators observed
18 Cheatham, Davis, and a third person together at the Seattle Tacoma International Airport.
19 Investigators observed the three depart in a vehicle. At the airport, investigators identified
20 Davis from an identification card photograph.

21 305. The same morning, on November 9, 2017, **TT24** called **TT15** (session 978).
22 Davis said, "What's up baby?" Davis told Cheatham, "They said twelve forty-five, they
23 should be in Federal Way." Cheatham said to tell them to "come to the address." Davis
24 told him, "She know where to go, I just told her to go that way."

25 306. Later, **TT15** called **TT24** (session 994). Cheatham asked, "What
26 happened?" Davis responded, "Shits on the way. What you mean?" Cheatham said, "I am
27 just saying because you said 12:45 and it's 1:30 and I'm just calling to see what
28 happened?" Davis said, "Yeah, well we been saying two anyway. I don't know if it's

1 traffic, whatever, but they got the directions.” They continued to talk about the timing
2 and Davis told Cheatham, “Yeah, uh ... it’s should be right there. Shit, I’m, I’m ... I’m
3 going that way just uh ... do the interception and I’m gonna [U/I] get in my truck, shit.”

4 307. Investigators went to **1412 69th Avenue East**, Fife, Washington. The **gray**
5 **Chevy Impala (BBK1418)** was parked in the driveway. At approximately 2:16 p.m.,
6 investigators saw Davis arrive in a gray Honda Accord (BBK2464) registered to Nakita
7 Cannady. Shortly afterwards, an Infinity QX8 (169KAM) arrived. The Infinity QX8 was
8 an Enterprise Rental vehicle. According to Enterprise, the Infinity QX8 was rented by
9 Carlisa McNeal at SeaTac Airport.

10 308. Davis got out of the gray Accord and went to the Infinity QX8. After
11 Davis’s arrival, GPS data from court-authorized tracking warrant for **TT24** showed that
12 that phone was in the vicinity of the residence. Davis spoke to a female (UF1) in the front
13 passenger seat of the silver QX8. Photographs were taken by a detective on physical
14 surveillance. Investigators reviewed the surveillance photographs. While the photos are
15 somewhat blurry and facial features cannot be clearly made out, a comparison of Nakita
16 Cannady’s Washington driver’s license photographs with the surveillance photographs
17 shows a likeness between Nakita Cannady to UF1. UF1 also appears to be a similar to the
18 height and weight listed on Nakita Cannady’s driver’s license. Based upon the
19 comparison of the photographs and UF1’s use of the gray Accord discussed herein,
20 investigators believe UF1 to be Nakita Cannady.

21 309. The driver of the Infinity QX8 was a male (UM1). Cannady exited the
22 Infinity QX8 and walked over to the gray Accord. Davis returned to the gray Accord
23 carrying a white grocery-type bag. Davis placed the bag in backseat area of the gray
24 Accord. Cannady and Davis walked back to the Infinity QX8. They opened the back
25 hatch of the Infinity QX8 and began moving items around. Cannady took a black duffle
26 bag from the rear compartment of the Infinity QX8 and walked over to the left rear seat.
27 Cannady opened the rear door and placed the bag inside. Davis followed Cannady and
28 began moving items around in the back seat of the Infinity where Cannady placed the

1 black duffle bag. Cannady went back to the rear hatch area and began placing items into a
2 more rigid shopping bag. Cannady then placed items from the bag in the gray Accord.

3 310. Davis removed a camo-colored backpack from the back seat. Davis placed
4 the backpack over his shoulder and removed a black duffle bag that Cannady placed there
5 from the back-hatch area. Davis carried the bags into **1412 69th Avenue East**.

6 Afterwards, Cheatham and Davis came out of the residence and spoke to each other in the
7 driveway.

8 311. Based upon my training and experience, I believe that the duffle bag and
9 other bags that were removed from the Infinity QX8 contained drugs. I also believe that
10 the Infinity QX8 was driven down to California and then used to transport the drugs back
11 to Washington from California. According to Enterprise, the Infinity QX8 was rented
12 from October 30, 2017 until November 12, 2017.

13 ***February 2018: Marcus Hall obtains drugs from Cheatham***

14 312. On February 20, 2018, **TT15** called Hall using TT31 (session 579).
15 Cheatham said to come by. Hall said he was getting on the freeway. Cheatham asked,
16 "You want the whole one or not?" Hall said, "I don't have that much." Hall said, "I
17 meant the whole half." At the end of the call Hall said, "I'll see you in a minute." Based
18 upon my training, experience, and knowledge of this investigation, I believe Hall was
19 going to obtain a half unit of cocaine or heroin from Cheatham.

20 313. Based upon this call, investigators went to **1412 69th Avenue East**.
21 Investigators saw a **gray Chevy Impala (BBK1418)** parked in the driveway. Shortly
22 thereafter, investigators saw Hall (identified from his driver's license photograph) arrive
23 in a green Cadillac STS (BHU7697) registered to Hall. Hall went inside the residence.
24 Half an hour later, Hall departed.

25 314. On February 22, 2018, TT31 called **TT15** (session 755). Hall said, "I need a
26 whole one. Frosty." Cheatham sang, "Frosty the snowman." Based upon my training and
27 experience, I believe that Hall was requesting cocaine. During a follow up call (session
28

1 795), Hall said he was in Fife waiting for Cheatham. Cheatham said, "I'm at home." Hall
2 said, "Here I come."

3 315. Investigators conducting surveillance at **1412 69th Avenue East** saw the
4 green Cadillac STS (BHU7697) arrive several minutes after the preceding call. Fifteen
5 minutes later, investigators saw Cheatham and Hall come out of the residence. Cheatham
6 departed in the **black Cadillac Escalade (BHY8148)**. Hall departed in his vehicle.

7 ***November 2017: Cheatham leaves phone at Nine Thousand Hair Salon***

8 316. On November 3, 2017, **TT15** called an unknown male (UM7602) using
9 206-491-7602 (session 100). UM7602 said, "Hey Che Che." "Your phone is at the
10 barbershop." "It's in Phil's drawer." Cheatham thanked UM7602.

11 ***March 2018: Street negotiates the price of a kilogram of cocaine***

12 317. Discussed in the section regarding Bradford Street, Street negotiated for a
13 kilogram of cocaine on March 4, 2018. There were no further communications until
14 March 7, 2018. It appeared Street using TT34 called **TT46** twice shortly after 7:00 a.m.
15 The calls went unanswered (sessions 1801 and 1802). Later **TT46** returned the calls
16 (session 1810). Cheatham complained about Street calling so early. Street apologized.
17 Cheatham said he would call in a couple of hours. Later in the afternoon TT34 sent a text
18 message to **TT46** reading, "Can you give me A call please! Thank's!"

19 318. Cheatham responded the following day on March 8, 2018 by sending a text
20 message from **TT46** to TT34 reading, "See you later today about 2:00" (session 1868).
21 TT34 responded, "Yep." At approximately 2:26 p.m., **TT46** called TT34 (session 1880).
22 Cheatham told Street he would be at the "barbershop."

23 319. Surveillance video footage shows Cheatham arrive in the **black Cadillac**
24 **Escalade (BHY8148)** at Nine Thousand Hair Studio and go inside. Several minutes later,
25 footage shows the **silver Mercedes S55 (BAL1564)** arrive and park. **TT46** then received
26 a call from TT34 (session 1887). Cheatham answered, "Brad" "Walk inside the
27 barbershop." Video footage shows Street getting out of the Mercedes and going into Nine
28 Thousand Hair Studio. A few minutes later, Street came out of the barbershop and

1 returned to the Mercedes. Street opened the trunk, and appeared to arrange items in the
2 trunk. Street then shut the trunk, got into the Mercedes and departed.

3 ***May 2018: Surveillance at 1412 69th Avenue East***

4 320. On May 8, 2018, investigators saw the **gray Chevrolet Impala (BBK1418)**
5 parked in the driveway of **1412 69th Avenue East**. Also parked in the driveway was a
6 silver Chevrolet Tahoe rental vehicle (Utah RO97J). On May 10, 2018, investigators
7 again saw the Tahoe parked in the driveway.

8 ***Most Recently***

9 321. On May 21, 2018, investigators saw **black Cadillac Escalade (BHY8148)**
10 parked in the driveway of **1412 69th Avenue East**. GPS data, while not precise,
11 indicated TT70 was in the vicinity.

12 **Drug Trafficking Activities of Michael Davis**

13 **MICHAEL DAVIS**

14 **Associated Locations: 825 30th Avenue, Seattle, Washington**

15 **Associated Vehicles: No associated vehicles sought**

16 322. **TT24** used by Michael Davis was the subject of wire and electronic
17 interception. Michael Davis's line was tapped after investigators learned that he was
18 engaged in drug trafficking with Cheatham. Investigators have found Davis to be a
19 significant source of supply for heroin in Western Washington. Some of his distributors
20 and those involved with his drug trafficking are discussed below.

21 ***Observations at 825 30th Avenue***

22 323. Discussed in the section regarding Charles Cheatham, Cheatham and Davis
23 flew to California to obtain drugs. Couriers transported drugs to Cheatham's residence in
24 Fife, where Davis met Cheatham and the couriers on November 9, 2017. Prior to arriving
25 at Cheatham's residence, investigators watched Davis depart **825 30th Avenue, Seattle,**
26 **Washington.** Details are in the following paragraphs.

27 324. On November 9, 2017, **TT24** called **TT15** (session 978). Davis told
28 Cheatham, "They said twelve forty-five, they should be in Federal Way." Cheatham said

1 to tell them to "come to the address." Davis told him, "She know where to go, I just told
2 her to go that way."

3 325. GPS data indicated **TT24** was in the vicinity of **825 30th Avenue**.
4 Investigators saw a gray Honda Accord (BBK2464) registered to Nakita Cannady parked
5 in front of the house. Investigators saw a black Acura arrive and park in front of the
6 house. Davis ran out of the house to the Acura and grabbed a backpack out of the Acura.
7 Davis immediately returned to the house. The Acura departed. Investigators followed the
8 Acura. GPS data indicated that **TT24** traveled to Cheatham's residence after investigators
9 left **825 30th Avenue**. I previously discussed that activity and Cheatham's residence.

10 326. On November 27, 2017, GPS data indicated **TT24** was in the vicinity of
11 **825 30th Avenue**. Investigators went to that location and saw Davis exit the residence
12 carrying a backpack. Davis got into a maroon Dodge 1500 rental vehicle (C11321K) and
13 departed. According to Alamo, this vehicle was rented to Carlisa McNeal.

14 327. On February 25, 2018, investigators saw Davis come out of **825 30th**
15 **Avenue**, go to a vehicle, and depart.

16 ***Most Recently***

17 328. A review of currently available toll data indicates TT70 used by Cheatham
18 has been in contact with **TT24** as recently as May 9, 2018. Davis lists **825 30th Avenue**
19 on his Washington identification card.

20 329. On May 23, 2018, investigators saw a black Cadillac Escalade parked in
21 front of **825 30th Avenue**. GPS data indicated **TT24** was in the vicinity. Investigators
22 saw Davis come out of the house with a backpack. A female was with him. Davis got into
23 the Escalade and departed.

24 ///

25 ///

1 **WAUNIKA WALKER**

2 **Associated Locations:** 4102 South 38th Street, Lower Unit, Tacoma,
3 Washington

4 **Associated Vehicles:** Black Chevrolet Tahoe (AUA9717)

5 330. Discussed below, Waunika Walker was identified using 206-565-6527,
6 which is subscribed to Walker at address 5641 South Montgomery Street, Tacoma,
7 Washington. Based upon intercepted calls, I believe Davis supplies Walker with heroin.

8 ***February 18, 2018: Davis supplies Walker***

9 331. On February 18, 2018, **TT24** used by Michael Davis received a text
10 message from 206-565-6527 reading "Shit need to see u." **TT24** responded, "Ok what u
11 gonna do how u tryin to do it." 206-565-6527 responded, "The whole thing ... And I'm
12 leaving Tacoma in 15 mins." **TT24** instructed, via text message, "Come to red Lion in
13 renton by Applebee's." 206-565-6527 later replied "Here" and "Black Tahoe" (**black**
14 **Chevrolet Tahoe (AUA9717)**). (Sessions 453, 456, 461, 475, 477 and 478). Based upon
15 my training, experience, and knowledge of this investigation, I believe that Davis
16 provided a whole unit, probably a kilogram, of heroin to Walker.

17 ***February 19, 2018: Complaint of quality***

18 332. On February 19, 2018, **TT24** received an incoming call (session 589) from
19 206-565-6527. Walker said, "I need to see you." Michael Davis asked, "What
20 happened?" Walker said, "she" (customer) "was like 'uh uh.' She like, 'you don't have
21 any more of that?'" Michael Davis, "That's your pickiest one." "What do you want me to
22 do?" "What do you got left or what?" "You should have one whole one left. I know you
23 didn't run through that one." Walker said she had "Forty four." Walker also said, "I still
24 have some of mine." Michael Davis asked, "So you just want me to switch it?" Walker
25 said, "Yeah." "By the time you get here its be forty four." "As long as I got it, I can sell
26 it." Michael Davis said he would, "I'm going to go to it." "Grab the shit." "When I get to
27 it, I'm gonna call you, I mean hit you, and you can just" "send the address."
28

1 333. A couple of hours later, **TT24** sent text message, "U ain't sent tha address."
 2 206-565-6527 responded, "5641 s Montgomery st Tacoma" (sessions 597 and 598). 206-
 3 565-6527 then called **TT24** (session 599). Walker said, "I just text you the address."
 4 Michael Davis asked, "You said right now you have how much?" Walker responded
 5 "Forty four." Michael Davis said, "That's exactly what I'm coming and bringing to then."

6 334. Investigators went to 5641 South Montgomery Street in Tacoma. There
 7 they observed a **black Chevrolet Tahoe (AUA9717)** registered to Walker at this address
 8 parked in the driveway. Investigators saw Davis arrive driving a maroon Nissan Sentra
 9 with a Florida license (rental vehicle). Davis went into 5641 South Montgomery Street.
 10 At approximately 2:00 p.m., investigators saw Davis leave the area in the maroon Nissan
 11 Sentra.

12 335. Later that evening, 206-565-6527 sent a text message (session 666) to **TT24**
 13 reading, "Oh and they really like this." **TT24** responded (session 669), "Yep I got hella I
 14 got cha."

15 336. Based upon my training and experience, I believe that on February 18,
 16 2018, Walker likely requested a kilogram of heroin from Michael Davis when referring to
 17 "the whole thing." I believe Walker's informed Michael Davis that her customers were
 18 not satisfied with the quality of heroin. Walker wanted to return the drugs. Based upon
 19 my training and experience, one kilogram of heroin is made up of 40 pieces (25 grams a
 20 piece). I believe that Walker was informing Michael Davis that she wanted to exchange
 21 44 pieces of heroin. Based upon the intercepted calls, I believe that Michael Davis agreed
 22 to exchange the drugs that Walker had with an equal amount of better quality heroin.
 23 Based upon the physical surveillance conducted in conjunction with the intercepted calls,
 24 this exchanged occurred at Walker's residence at 5641 South Montgomery Street,
 25 Tacoma, Washington.

26 ***February 28, 2018: Walker orders 10 ounces of heroin from Davis***

27 337. On February 28, 2018, 206-565-6527 called **TT24** (session 1557). During
 28 the call, Walker said, "I need to see you." Michael Davis asked, "What you trying to do?"

1 Walker said, "Ten" (ten pieces or a quarter kilogram of heroin). The two discussed
2 generally where to meet. Later, **TT24** called 206-565-6527 (session 1572). Michael Davis
3 said he "just got to it." The two discussed meeting at a Burger King and near the Great
4 American Casino on "224th." During session 1578, at approximately 11:46 a.m., Michael
5 Davis using **TT24** told Walker using 206-565-6527 that he would be at the Burger King.

6 338. Investigators went to the Burger King located near Kent Des Moines Road
7 and Pacific Highway South. This is just south of the Great American Casino.
8 Investigators observed a silver Nissan coupe (rental vehicle) driven by Michael Davis
9 (identified from his driver's license photograph) in the drive-thru. After proceeding
10 through the drive-thru, Michael Davis parked in the middle of the lot.

11 339. A little over ten minutes later, investigators observed the **black Chevrolet**
12 **Tahoe (AUA9717)** pull into the Burger King and park near the silver Nissan coupe.
13 Walker, identified by her driver's license photograph, got out of the driver's seat of the
14 Tahoe and got into the passenger seat of the silver Nissan coupe. Investigators could see
15 Walker leaning toward the center console. Moments later, Walker got out of the silver
16 Nissan coupe and returned to the Tahoe. Both vehicles departed.

17 ***May 2018: Surveillance at 5641 South Montgomery Street***

18 340. In May 2018, investigators conducted surveillance at 5641 South
19 Montgomery Street. Investigators noticed that the house was under remodel and it
20 appeared no one was living there. Investigators conducted a commercial law enforcement
21 database check and learned that Walker was recently associated with **4102 South 38th**
22 **Street**, Tacoma, Washington.

23 ***May 2018: Surveillance at 4102 South 38th Street***

24 341. On May 18, 2018, investigators saw the **black Chevrolet Tahoe**
25 **(AUA9717)** arrive at **4102 South 38th Street**. A female, not Walker, got out of the
26 vehicle and walked into the **Lower Unit** through a door under the deck on the south side
27 of the house. Later, investigators saw Walker come out from the **Lower Unit** and get into
28

1 the Tahoe. Walker retrieved something from the center console and went back into the
2 **Lower Unit.**

3 ***Most Recently***

4 342. A review of currently available toll data indicates **TT24** used by Michael
5 Davis has been in contact with 206-565-6527 as recently as May 3, 2018. On May 27,
6 2018, investigators saw the **black Chevrolet Tahoe (AUA9717)** parked at **4102 South**
7 **38th Street.**

8 **RASHEED ECHOLS**

9 **Associated Locations: 14581 Northeast 35th Street, Apartment F312**
10 **Bellevue, Washington**

11 **Associated Vehicles: Green Honda SD (BJC9550)**

12 343. Based upon intercepted calls, I believe Michael Davis supplies Rasheed
13 Echols with controlled substances. Discussed below, Echols was identified using TT65
14 for which a tracking warrant was authorized. Investigator identified Echols using TT65
15 both by conducting physical surveillance contemporaneously with intercepted calls and
16 locating Echols with GPS data for TT65. GPS data showed that TT65 was often in the
17 vicinity of **14581 Northeast 35th Street, Bellevue, Washington** overnight.

18 344. On February 15, 2018, Michael Davis using **TT24** called Echols using
19 TT65 (session 212). Echols said, "I still need some Holly Madison" An internet search of
20 "Holly Madison" revealed images of a blonde white model, showgirl, television
21 personality and author. Based upon my training and experience, I know that cocaine is
22 often referred to as "white girl". I believe that Echols was referring to cocaine when he
23 mentioned Holly Madison. Davis said, "he" (source) had to call Davis back because he
24 had to check himself into the hospital because of the "flu or something". The two talked
25 about money owed to Davis.

26 345. Echols said, "We need to sit down and talk" about "when he comes with
27 twenty, twenty bands" (\$20,000). After discussing amounts, Davis said, "It's not crack.
28 You don't sell them by the nines. You sell them by the tens." Davis said he could, "take a

1 hundred dollars off for you” “so you can get them at nine hundred” “You get a hundred
2 bucks for each one.” “You getin’ twenty” “you gonna put two thousand dollars off top in
3 your pocket.” (\$2,000 profit from selling the 20 ounces of heroin).

4 346. Echols agrees with Davis then asked, “when you go get on or whatever be
5 the case, I mean can I get fresh of the thing? Like he’s willing to pay. Like look man you
6 know what I mean, like I don’t know maybe like drop a little finny” (fentanyl) “in there”
7 “Can we just get some shit that’s just like out of this world? Fuck it, he’ll pay more.”
8 Davis says that his “shit is already good, its already passable” “I’m not putting nothing in
9 that shit.” Towards the end of the call, Echols states he wants to “come get one or two
10 more” (ounces of heroin) from Davis so a third party can “try the new batch.” Echols
11 then indicated that the third party could come “back Monday for like ten” (10 ounces of
12 heroin).

13 347. Based on my training and experience I believe, Echols arranged to pick up
14 one or two ounces to show his customer a sample, and then Echols would later obtain ten
15 ounces of heroin from Davis later.

16 348. On February 21, 2018, **TT24** received a call from TT65 (session 783).
17 Davis and Echols agreed to meet. Echols asked, “I buy one, you got me?” Davis said, “I
18 got you.” Later, **TT24** called TT65 (session 787). Davis suggested to meet “downtown.”
19 Davis instructed Echols to take the “James Street exit” and go to the 76 gas station near
20 “Harborview” (Medical Center).

21 349. **TT24** sent a text message to TT65 reading “At tha 76” (session 794). At the
22 same time, investigators saw Davis at the gas station driving a red Nissan Sentra rental
23 vehicle (EVXD65).

24 350. Several minutes later, TT65 replied, “Headed there now” (session 797).
25 Davis drove to a side street and waited for Echols. TT65 then called **TT24** (session 803).
26 Davis provided directions to his location. At the end of the call, Davis and Echols
27 acknowledged seeing each other. Investigators saw Echols arrive in a blue Audi coupe
28

1 (7XAF615). Echols got out of the Audi and got into the Nissan. Several minutes later,
2 Echols got out of the Nissan and returned to the Audi. The two vehicles departed.

3 351. On February 26, 2018, **TT24** received a call from TT65 (session 1328).
4 Echols said, "I'm gonna need at least four or five." Davis told Echols to "come towards
5 the Central" (Central District of Seattle). Based upon my training and experience, I
6 believe that Echols requested four or five ounce of controlled substances.

7 352. Investigators went to **825 30th Avenue** in Seattle. GPS data indicated **TT24**
8 was in the vicinity. Investigators saw Davis come out of the house and get into a Nissan
9 Altima rental vehicle (AZV9200) parked in front of the residence.

10 353. Investigators followed the Nissan to the nearby Grocery Outlet.
11 Investigators saw Echols, recognizing him from surveillance photographs taken February
12 21, 2018. Investigators saw Davis meet with Echols and another subject.

13 354. Davis departed after meeting with them. Echols left in a white Toyota
14 Corolla rental vehicle (California 7ZMG008). Investigators had uniformed Seattle Police
15 officer stop the Toyota. Echols was identified as the driver after providing the officers
16 with his driver's license.

17 ***May 2018: Surveillance at 14581 Northeast 35th Street, Apartment F312***

18 355. On May 10, 2018, GPS data indicated TT65 was traveling towards **14581**
19 **Northeast 35th Street**, Bellevue, Washington. Investigators went to that location and
20 awaited Echols's arrival. Investigators saw an occupied white Chevrolet Impala in the lot.

21 356. Later, investigators saw a **green Honda SD (BJC9550)** arrive, driven by a
22 female. Echols was a passenger. The Honda parked, and the driver walked up the stairs to
23 **Apartment F312**. Echols stayed in the Honda. A woman came from the Impala and met
24 with Echols. Shortly thereafter, the woman returned to the Impala and started to drive
25 away. As she passed Echols in the Honda, the driver of the Impala said "Thank you" and
26 the Impala departed. Based upon my training and experience, I believe this was a drug
27 transaction.
28

357. The female driver of the Honda came down the stairs from **Apartment F312** with a bag of trash and threw the trash in the dumpster. She got into the Honda with two other people. She departed in the green Honda with Echols and the two others.

358. On May 11, 2018, TT65 was in this vicinity of **14581 Northeast 35th Street, Apartment F312**. Investigators saw Echols come out of **Apartment F312** and stand by the **green Honda SD (BJC9550)**. Investigators saw Miranda Edwards come out of Apartment F312 and go the Honda. Edwards lists this address on her driver's license and investigators recognized her from the driver's license photograph. The two left in the Honda. GPS data indicated TT65 left at approximately the same time.

359. Later, investigators saw Echols, Edwards, and another woman return in the Honda. This time Echols was driving. Edwards and the woman went into **Apartment F312**. Eventually, Echols got out of the vehicle and walked into **Apartment F312**.

Most Recently

360. A review of currently available toll data indicates **TT24** used by Michael Davis has been in contact with TT65 as recently as May 9, 2018. On May 22, 2018, TT65 was in the vicinity of **14581 Northeast 35th Street, Apartment F312**.

361. On May 23, 2018, GPS data indicated TT65 was in the vicinity of **14581 Northeast 35th Street, Apartment F312**. Investigators went to that location and saw the **green Honda SD (BJC9550)** parked near the building for **Apartment F312**. Investigators saw Echols exit **Apartment F312** and then returned to the apartment within a couple of minutes.

STACY HUMPHREY

**Associated Locations: 2426 South 224th Street, Apartment 102
Des Moines, Washington**

Associated Vehicles: Black GMC Acadia (BIX8744)

362. Based upon intercepted calls and GPS data for **TT24** used by Davis, I believe Davis has a relationship with Humphrey. Humphrey has rented vehicles used for the purposes of drug trafficking during this investigation. Davis also frequents

1 Humphrey's residence at **2426 South 224th Street, Apartment 102**. In monitoring GPS
2 data for various phones used by Michael Davis during the course of this investigation,
3 Davis does not take up residence at any one particular location for long periods of time.
4 **2426 South 224th Street, Apartment 102** is one of the locations often frequented by
5 Davis, and I believe that Davis may store drugs and/or currency at this location.

6 363. Discussed in the section regarding seizures, investigators seized
7 methamphetamine and suspected MDMA from Davis riding in a white Cadillac rental
8 vehicle bearing Washington license 7WML000 on December 17, 2017. According to
9 Budget Rentals, this vehicle was rented to Stacy Humphrey from December 13 through
10 20, 2017. Humphrey provided **2426 South 224th Street, Apartment 102**, Des Moines,
11 Washington as her address to Budget.

12 364. Also discussed in the section regarding seizures, investigators seized heroin
13 from a GMC Acadia rental vehicle bearing Washington license BEM9349 and
14 impounded the vehicle on January 7, 2018. On January 8, 2018, Stacy Humphrey
15 contacted the law enforcement in Lewis County stating that she received an anonymous
16 call from a blocked number informing her that the Acadia was impounded in Lewis
17 County. Humphrey said she rented the vehicle and it was stolen from her driveway. She
18 identified her telephone number as 253-653-5377. This phone is subscribed to a Sandra
19 Mills listing subscriber address as **2426 South 224th Street, Apartment 102**.

20 365. On January 10, 2018, GPS data indicated **TT24** was in the vicinity of **2426**
21 **South 224th Street**. Investigators saw a dark colored GMC Yukon with California
22 license 7VLR806 (rental vehicle) parked at the complex. Investigators know that Davis
23 often drives rental vehicles. According to Alamo, this vehicle was rented by Stacy
24 Humphrey.

25 366. On February 25, 2018, **TT24** called 253-653-5377 (session 1271).
26 Humphrey asked why Davis was ignoring her and said she has been calling Davis's other
27 phone. Humphrey said to "leave fucking Red Lion and bring you ass home." The two
28

1 started to argue and Davis hung up. Humphrey sent a series of text messages including,
2 “Ur making money but being a tramp at the same time .” (session 1295).

3 367. On March 13, 2018, 253-653-5377 sent a text message to **TT24** reading,
4 “Babe can u please bring that money to the house so I can pay my car note and get food
5 and house supplies. Thank u” (session 3116).

6 368. On May 9, 2018, GPS data indicated that **TT24** used by Davis was at **2426**
7 **South 224th Street** in the vicinity of **Apartment 102**. Also, on May 13, 2018, GPS data
8 indicated that **TT24** was at **2426 South 224th Street** in the vicinity of **Apartment 102**.

9 369. On May 15, 2018, investigators saw a male come from the area leading to
10 **2426 South 224th Street, Apartment 102** and walk to a **black GMC Acadia**
11 **(BIX8744)**. The male retrieved an item of clothing and then walked back toward
12 **Apartment 102**. The Acadia was registered to Humphrey listing **2426 South 224th**
13 **Street, Apartment 102** on the registration. Humphrey also lists this address on her
14 driver’s license.

15 ***Most Recently***

16 370. A review of currently available toll data indicates **TT24** used by Michael
17 Davis has been in contact with 253-653-5377 as recently as May 7, 2018. On May 11,
18 2018, PSE identified Humphrey as a utility customer at **2426 South 224th Street,**
19 **Apartment 102**. Humphrey also lists this address on her driver’s license.

20 371. On May 21, 2018, GPS data indicated **TT24** used by Michael Davis was in
21 the vicinity of **2426 South 224th Street, Apartment 102** for more than an hour. On May
22 24, 2018, investigators saw a **black GMC Acadia BIX8744** registered to Humphrey
23 arrive and park at **2426 South 224th Street**. Humphrey, identified from her driver’s
24 license photograph, spoke to another person in the lot. Humphrey and the other person
25 approached the detective conducting surveillance and inquired as to why the detective
26 was there. Afterwards, Humphrey then walked towards **Apartment 102**. As Humphrey
27 walked towards the stairwell, she took a set of keys out of her pocket. Investigators were
28 able to see her use the key to enter **Apartment 102**.

1 **MECHELLAY BROADNAX**

2 **Associated Locations: 5014 39th Avenue South, Apartment 303**
 3 **Seattle, Washington**

4 **Associated Vehicles: No associated vehicles sought**

5 372. Based upon intercepted calls, I believe that Davis uses Broadnax's bank
 6 account to transfer drug proceeds. Discussed below, I believe Broadnax recently moved
 7 to **5014 39th Avenue South, Apartment 303**. Based upon GPS data for **TT24**, I believe
 8 that Michael Davis often spends nights at this location. Davis has been seen accessing
 9 this apartment using a key.

10 373. On February 23, 2018, Michael Davis using **TT24** received a call from an
 11 unknown male (UM4709) using 309-299-4709 (session 1071). Davis said, "About time"
 12 Davis got a call. Davis said, "Now you ain't calling me once you get the shit huh?"
 13 UM4709 yelled, "I don't have your fucking number." "Lion's bitch ass won't give me
 14 your number because he robbed me." "Todd won't give me your number because he is
 15 trying to middleman the play. Man that's not my fault bro." The two discussed how
 16 UM4709 was wronged by his associates.

17 374. UM4709 said, "I'm ready for a move." Davis said, "I'm not bringing that
 18 shit there." "You can come here and get on." UM4709 said, "Don't even worry about it
 19 bro." UM4709 said he was going to "flash you with the rest of your paper." Davis asked,
 20 "Why I got to wait ten days just to get a thousand dollars though." UM4709 asked, "What
 21 you want me to do?" Davis said, "Just drop it in the Wells Fargo for me. I'll send you the
 22 info." Based upon my training and experience, I believe that Davis called UM4709 to
 23 collect owed drug proceeds.

24 375. Later that day, 309-299-4709 called **TT24** (session 1087). UM4709 said,
 25 "Boy, what bank boy?" Davis said, "Wells Fargo." UM4709 said, "You aint never send
 26 me the text." Davis responded, "I thought you knew." UM4709 asked, "You guys spell
 27 her name like that on the paper with the apostrophe and shit?" Davis said, "I would."
 28

1 376. On February 26, 2018, **TT24** sent a text to 309-299-4709 reading,
2 "Account# 2148230879 routing # 111900659 Me'Chellay Broadnax" (session 1318).
3 Later in the day, 309-299-4709 responded (session 1341), "Its otw" (on the way). I
4 reviewed Wells Fargo records for this account. I did not see any deposits coinciding with
5 the above-described calls.

6 377. However, a review of the records show there is activity similar to what is
7 described above. For example, I found that in the above described account, on July 21,
8 2017, a \$360 cash deposit was made into an ATM at a Spokane Wells Fargo Branch.
9 Then there was a deposit at the same branch with a teller for \$1044 cash. Then,
10 afterwards, on the same day at a different branch in Spokane, there was \$1005 cash
11 withdrawal from the account. Based upon my training and experience, I believe that this
12 account is being used transfer drug proceeds.

13 ***May 2018: Surveillance at 5014 39th Avenue South***

14 378. On May 6, 2018, investigators conducted surveillance at 408 25th Street
15 Southeast Apartment 26, Auburn, Washington. This is the address listed on Broadnax's
16 driver's license. Investigators determined she did not live there. According to PSE, the
17 utilities customer started new service there on March 27, 2018.

18 379. GPS data in May 2018 indicated **TT24** was frequenting the vicinity of **5014**
19 **39th Avenue South**, Seattle, Washington. A check of a commercial law enforcement
20 database indicated that Broadnax started service on a utility at April 12, 2018 at **5014**
21 **39th Avenue South, Apartment 303**.

22 380. On May 15, 2018, investigators went to **5014 39th Avenue South,**
23 **Apartment 303**. GPS data indicated **TT24** was in the vicinity. GPS data also indicated
24 **TT24** was here overnight the previous three nights. Investigators saw Davis, carrying a
25 backpack, come out of **Apartment 303** and walk to a silver Jeep Cherokee rental vehicle
26 (BIG7697) and depart. According to Sixt Rentals, the Cherokee was rented by Carlisa
27 McNeal, discussed below. About an hour later, investigators saw Davis return and go into
28

1 **Apartment 303.** About twenty minutes later, Davis came back out of **Apartment 303**
 2 and departed in the Cherokee again.

3 ***Most Recently***

4 381. On May 21, 2018, investigators saw Michael Davis use a key to enter **5014**
 5 **39th Avenue South, Apartment 303.** GPS data indicated **TT24** remained there
 6 overnight.

7 **NONIS CLAYTON**

8 **Associated Locations: 23030 30th Avenue South, Apartment C**
 9 **Des Moines, Washington**

10 **Associated Vehicles: Red Kia Soul (AWE7583)**

11 382. Based upon information from a confidential source of information
 12 (discussed below), investigators believe that Nonis Clayton has a relationship with
 13 Michael Davis. Davis has provided Clayton's bank account information during
 14 intercepted calls for the purposes of transferring drug proceeds. Investigators have also
 15 seen Clayton during physical surveillance with Davis during this investigation. As
 16 previously discussed, Davis does not take up residence at any one particular location for
 17 long periods of time. **23030 30th Ave South, Apartment C** is one of the locations often
 18 frequented by Davis, and I believe that Davis may store drugs and/or currency at this
 19 location.

20 ***November 2017: Clayton picks Davis up after drug trafficking trip to LA***

21 383. As discussed in the section regarding Charles Cheatham, Cheatham and
 22 Michael Davis flew to Los Angeles and returned in the early morning hours (2:00 a.m.)
 23 of November 9, 2017. Investigators conducted surveillance upon their return.
 24 Investigators followed Cheatham and Davis from the airport to the 13 Coins restaurant
 25 nearby. Investigators saw a **red Kia Soul (AWE7583)** registered to Clayton arrive.
 26 Investigators saw that Clayton was the driver (identified from her driver's license
 27 photograph). Investigators saw Davis come from the restaurant, get into the Kia, and
 28 depart with Clayton.

1 384. During this investigation, SOI1²¹ informed investigators that Davis has a
 2 woman known to SOI1 as "Nonis" who rents vehicles for Davis to use. SOI1 believed
 3 that Davis may reside with her.

4 385. On November 14, 2017, investigators went to **23030 30th Avenue South**.
 5 Investigators saw the **red Kia Soul (AWE7583)** parked in front of **Apartment C**.

6 ***February 2018: Intercepted calls regarding using Clayton's bank account***

7 386. On February 19, 2018, **TT24** sent a text to an unknown male (UM5333)
 8 using 309-351-5333 reading, "I hear all that but what's up wit a band I can touch it's
 9 been hard time for me too" (session 653). Based upon my training and experience, I
 10 know a band to be \$1000, and I believe Davis was requesting that UM5333 send him
 11 money. 309-351-5333 responded, "Got 2 for u" (session 656). **TT24** asked, "How u
 12 sending it wells Fargo" (session 659). 309-351-5333 responded, "I'll hit you tomorrow"
 13 (session 665). Based upon my training and experience, I believe this money to be drug
 14 proceeds.

15 387. On February 20, 2018, **TT24** sent a text message to UM5333, "What up tho
 16 so.. how we doin it" (session 683). After some additional text exchanges, **TT24** sent,
 17 "Nonis Clayton #5991870501" to 309-351-5333 (session 687).

18 388. On February 21, 2018, **TT24** received a call from 309-351-5333 (session
 19 795). UM5333 said, "So look. You want me to drop it. Boom. So if he runs another two,
 20 then what. I ain't going to" "continue droppin'." Davis responded, "There aint nothing
 21 wrong with that." UM5333 said, "That's hot." Davis stated, "No its not hot. How the fuck
 22 is that hot. That ain't even over ten thousand, you ain't even doing five thousand. How's
 23 that hot?" UM5333 said, "Three drops for two? That's hot." Davis said, "Two thousand,
 24 that ain't shit, that ain't nothing." Based upon my training and experience, I believe that
 25

26 ²¹ SOI1 is hoping for consideration for potential drug charges. SOI1 has several felony convictions regarding drugs
 27 and possessing firearms, and a conviction for assault. SOI1 also has numerous misdemeanor convictions related to
 28 driving and other municipal violations. During an interview, SOI1 provided detailed information regarding many of
 the subjects discussed in this Affidavit. Based on the information provided, investigators find SOI1 to be credible
 after providing corroborated information.

1 Davis expected UM5333 to deposit at least \$6,000 into Nonis Clayton's account, \$2,000
2 at a time. I believe that UM5333 believed that these deposits would be suspicious and
3 draw the attention of law enforcement by describing the deposits as "hot." Davis
4 reassured him that the deposits were fine and would not draw suspicion. About thirty
5 minutes later **TT24** received another call from 309-351-5333. UM5333 said, "It's in
6 there."

7 389. According to Wells Fargo Bank, Nonis Clayton opened checking account
8 number 5991870501 on August 13, 2015. A review of deposits and withdrawals for this
9 account does not show that any deposits were made on February 21, 2018. Based upon
10 my training and experience, I believe that while Davis suggested that UM5333 use this
11 account, UM5333 likely deposited the funds in an account previously used by the two to
12 transfer funds.

13 390. However, a review of the account records show there is suspicious activity
14 that, based upon my training and experience, is indicative of the transfer of drug proceeds
15 using this account. For example, on October 27, 2017, there were two ATM cash deposits
16 made to the account, one deposit for \$570 and one deposit for \$260 in Seattle,
17 Washington. Then three days later, on October 30, 2017, there were three ATM cash
18 deposits to the account made in Westchester, California: \$520, \$300, and \$240.

19 391. In January 29, 2017, an ATM cash deposit was made to the account for
20 \$300. Then on the same day, there were two ATM withdrawals: \$100 and \$20. I suspect,
21 based upon the intercepted calls regarding Broandax's and Clayton's accounts, that these
22 cash deposits were drug proceeds.

23 ***May 2018: Surveillance at 23030 30th Ave South, Apartment C***

24 392. On May 7, 2018, investigators observed a red Kia Soul (AWE7583)
25 registered to Clayton at **23030 30th Ave South, Apartment C**, Des Moines, Washington.
26 The registration on the vehicle lists this address. Investigators saw Clayton exit the
27 doorway of the apartment building, get into the Kia and depart.
28

1 393. On May 8, 2018, investigators saw Clayton arrive alone in the **red Kia**
 2 **Soul (AWE7583)**. Clayton parked in a parking spot marked with the letter "C" directly
 3 in front the stairway leading to **Apartment C**. Clayton got out of the vehicle went into
 4 **Apartment C**.

5 ***Most Recently***

6 394. On May 11, 2018, PSE identified Clayton as a utility customer for **23030**
 7 **30th Ave South, Apartment C**. Clayton also lists this address on her driver's license.

8 395. On May 22, 2018, investigators saw the **red Kia Soul (AWE7583)** parked
 9 in front of **23030 30th Avenue South, Apartment C**.

10 396. GPS data indicates that **TT24** frequents **23030 30th Ave South,**
 11 **Apartment C**, most recently on May 18, 2017.

12 **CARLISA MCNEAL**

13 **Associated Locations: 5405 Lakemont Boulevard Southeast,**
 14 **Apartment 447**
 Bellevue, Washington

15 **Associated Vehicles: No associated vehicle sought**

16 397. Investigators suspect that Michael Davis has a relationship with Carlisa
 17 McNeal. Discussed below, McNeal rented a vehicle used by Davis to transport narcotics.
 18 GPS data indicates **TT24** used by Davis frequents McNeal's residence at **5405 Lakemont**
 19 **Boulevard Southeast, Apartment 447** and sometimes spends night there. As previously
 20 discussed, Davis does not take up residence at any one particular location for long
 21 periods of time. **5405 Lakemont Boulevard Southeast** is one of the locations often
 22 frequented by Davis, and I believe that Davis may store drugs and/or currency at this
 23 location.

24 ***November 2017: Vehicles rented by McNeal***

25 398. Discussed above in the section regarding Cheatham, investigators believe
 26 that Cheatham and Michael Davis had couriers transport drugs from Los Angeles to
 27 Cheatham's residence. The suspected courier vehicle was a gray Infinity QX8 rental
 28

1 vehicle with Oregon license 169KAM. According to EAN Holdings (rental company),
 2 this vehicle was rented by Carlisa McNeal. McNeal listed TT27 as her phone number.

3 399. On November 14, 2017, investigators saw Michael Davis driving a white
 4 Dodge Durango rental vehicle with California license 7ZBE670. According to Alamo,
 5 Carlisa McNeal rented this vehicle.

6 400. According to Sprint, TT27 is subscribed to Carlisa McNeal listing **5405**
 7 **Lakemont Boulevard Southeast, Apartment 447**, Bellevue, Washington as her address.
 8 In November and December of 2017, GPS data indicated that TT27 was often in this
 9 vicinity of during overnight hours.

10 ***May 2018: Surveillance at 5405 Lakemont Boulevard Southeast, Apartment 447***

11 401. On May 10, 2018, GPS data for **TT24** used by Davis indicated that the
 12 phone was in the vicinity of **5405 Lakemont Boulevard Southeast, Apartment 447**.
 13 Investigators saw the lights were on to Apartment 447. Minutes later, investigators saw
 14 the lights in the apartment were turned off. Thirty seconds later, investigators saw Davis
 15 carrying a bag come from the stairwell to Apartment 447, go to a White Jeep Cherokee
 16 rental vehicle with Washington license BIG8112 and depart.

17 ***Most Recently***

18 402. On May 17, 2018, GPS data for **TT24** used by Davis showed that the phone
 19 was located in the vicinity of **5405 Lakemont Boulevard Southeast, Apartment 447**
 20 during late night hours.

21 403. On May 23, 2018, GPS data indicated **TT24** was in the vicinity of **5405**
 22 **Lakemont Boulevard Southeast, Apartment 447**. Investigators went to this location
 23 and saw Davis come out of **Apartment 447** and walk down the stairs. Davis then got into
 24 the driver's seat of a black Cadillac Escalade (BGE2665) and departed.

25 ***Drug Traffickers Involved with Danavian Hunter***

26 404. **TT17** used by Danavian Hunter was the subject of wire and electronic
 27 interception. Hunter's line was tapped after investigators learned that he was engaged in
 28 drug trafficking with Michael Morgan using **TT1**. Investigators have found Hunter to be

1 heavily involved with the trafficking of large amounts of marijuana. Santichith
 2 Hochingnavong and Chryar Mitchell are engaged in marijuana trafficking with Hunter.

3 **SANTICHITH HOCHINGNAVONG**

4 **Associated Locations: No associated location sought**

5 **Associated Vehicles: No associated vehicle sought**

6 405. Discussed below, Santichith Hochingnavong was identified using 425-
 7 306-4138. Based upon intercepted calls, I believe that Hochingnavong is a large scale
 8 source of supply for marijuana involved in interstate distribution with Danavian Hunter.
 9 During interception of *TTI7*, used by Hunter, he and Hochingnavong traveled from
 10 Western Washington to Atlanta, Georgia and Pensacola, Florida to facilitate the sale of
 11 marijuana in excess of fifty pounds. Hunter made contact with several people, including
 12 two nephews, in the Pensacola area to facilitate the distribution of marijuana.

13 ***November 29, 2017: Coordination for distribution in Florida area***

14 406. On November 29, 2017, Hunter using *TTI7* received a Multi-Media
 15 Message (MMS) (Product ID 1509999) from 425-306-4138, depicting a photograph of
 16 United Airlines confirmation number and flight information for a flight departing SeaTac
 17 airport on Saturday, December 2, 2017, and arriving the same day in Atlanta.
 18 Hochingnavong using 425-306-4138 called *TTI7* (session 1222) and said, "Everything's
 19 spoken, you, you're set to go and" "I'm leaving on Friday morning so I get there in the"
 20 "afternoon on Friday so that I can, you know, like kind of sight-seeing the shit. You
 21 know what I mean?" "You'll be there by" "Saturday" "in the afternoon, I think."
 22 Hochingnavong stated that he already arranged a car rental. Hunter stated, "We're good
 23 to go, then." Hochingnavong said, "Yup" "It's all done and deal."

24 407. On November 30, 2017, *TTI7* received a call from 425-306-4138 (session
 25 1307). Hochingnavong asked if Hunter received the text message regarding the flight.
 26 Hochingnavong said that Hunter was flying out at 7:00 a.m. with United Airlines.
 27 Hochingnavong informed Hunter that the text message had Hunter's "itinerary."
 28 Hochingnavong was referencing the MMS message mentioned above (Product ID

1 1509999). In response to an administrative subpoena, United Airlines provided flight
2 details for the United Airlines flight for Hunter. It appears that Hochingnavong booked
3 this flight for Hunter.

4 408. Hochingnavong stated that he (Hochingnavong) was flying out the
5 following morning giving him the whole day to do what he needed to do before Hunter
6 arrived. Hunter asked if the trip was round trip or one way. Hochingnavong stated that
7 the flight was one way. Hochingnavong stated that if "there's work" Hochingnavong
8 would try to "finish it" if Hunter's "people could do it."

9 409. Hunter said he wanted to give his nephew "a good deal on like twenty"
10 (pounds of marijuana) and that way, Hunter's nephew could help them "run through the
11 rest." Hunter stated that he had two nephews, but they would be dealing mostly with the
12 "main one." Hochingnavong acknowledged and said they would figure it out once they
13 got there. Hochingnavong said he "couldn't push too much" (referencing his negotiations
14 with sources of supply).

15 410. Based upon my training and experience, I believe Hochingnavong is
16 facilitating for source(s) of supply of marijuana and Hunter was having his nephews
17 arrange for the marijuana's distribution. Hunter was attempting to ensure one nephew
18 received a good deal for at least a portion of the product to be distributed.

19 411. A couple of hours later, **TT17** called 425-306-4138 (session 1318). Hunter
20 said that he wanted to talk to Hochingnavong "in person." Hochingnavong told Hunter to
21 meet him in Renton at the laundromat on Rainier by Arco. Hunter acknowledged that he
22 would meet Hochingnavong in ten to fifteen minutes at the laundromat near AM/PM.

23 412. **TT17** then called an unknown male (UM8066) using (850) 512-8066
24 (session 1319). Hunter referred to UM8066 as "Cuzzo" (cousin). During the
25 conversation, Hunter asked, "You got some licks" (customers) 'lined up for some
26 bowls?' (marijuana). UM8066 said, "Yup." Hunter asked, "What you be hitting them
27 for?" (how much UM8066 was selling pounds of marijuana for). UM8066 said that "it
28

1 depends." Hunter said that it "it's gonna be that real deal" (marijuana was of good
2 quality).

3 413. UM8066 asked, "What, what you gonna charge me?" Hunter responded,
4 "My people want like" "twenty- two" (\$2,200 per pound) "because of what we gotta do
5 to make it happen to get it there." As set forth below, based on subsequent intercepts and
6 tracking data, "there" was a reference to a location in the State of Florida. Hunter
7 continued, "For a person to have to travel and do everything that they gotta do to make it
8 happen and, you know what I mean? It gotta be worth it." Hunter stated, "I'm in
9 negotiation with my people right now." "Trying to figure out the logistics and
10 everything." Hunter told UM8066, "I want you to make something too," "be able to eat,
11 you know what I mean, and do what you need to do." UM8066 responded to Hunter's
12 proposal, "You know we gonna make it happen."

13 414. **TTI7** then received a call from 425-306-4138 (session 1320). Hunter
14 answered, informing Hochingnavong that he was five or ten minutes away.

15 415. **TTI7** then immediately called an unknown male (UM3108) using 850-292-
16 3108 (session 1322). UM3108 answered and referred to Hunter as "Unc" (Uncle). During
17 the conversation Hunter asked, "You got some licks" (customers) "lined up?" UM3108
18 responded, "I could make things happen." Hunter stated, "You could charge them ...
19 twenty-three, twenty-four" (\$2,300 or \$2,400 per pound of marijuana) "and make your
20 little money off of it." UM3108 said he "might have some in the tank" (customers
21 waiting) "if it's available." Hunter stated, "We just want twenty-two. You know what I'm
22 saying? Twenty-two bucks" (\$2,200 a pound).

23 416. After the above conversation, **TTI7** then again received a call from 425-
24 306-4138 (session 1323). Hunter said he was about to arrive. Hochingnavong said he was
25 in the back. Conducting physical surveillance, investigators located a **gray Lexus ES**
26 **(BHJ4065)** registered to Hunter at the Renton Laundry on Rainier Avenue North in
27 Renton, Washington. The Lexus was parked near a white Acura MDX. While watching
28

1 the vehicles, investigators intercepted an outgoing call from **TT17** to an unknown male
2 (UM4162) using 678-789-4162 (session 1327).

3 417. At the beginning of the call, Hochingnavong could be heard in the
4 background of **TT17** talking to someone else on a telephone. When UM4162 answered,
5 Hunter referred to UM4162 as "nephew." Hunter said he was talking to the "line" (source
6 of supply) right now and that the line was right there with him (Hunter). Hunter asked
7 what UM4162 and his associates "could handle" (distribute) "at twenty-two" (\$2,200 per
8 pound). UM4162 said, "We probably gonna need twenty to thirty at a time" "if they
9 twenty-two" and "some good shit."

10 418. The two talked about different strains of marijuana including, "blue
11 dream," "bb," "perp," and "kush." UM4162 said it was possible that every week it could
12 be "sixty to seventy" (pounds) "every week." UM4162 said that "we do that every week."

13 419. Investigators then saw Hochingnavong get out of Hunter's Lexus and return
14 to the MDX. Both vehicles departed. Investigators photographed Hochingnavong. I
15 compared an Oklahoma Department of Corrections photograph of Hochingnavong and
16 compared this photograph to surveillance photographs. I believe that Hochingnavong is
17 the subject in the surveillance photographs of Hochingnavong getting out of Hunter's
18 vehicle.

19 420. On December 1, 2017, 425-306-4138 called **TT17** (session 1358).
20 Hochingnavong told Hunter that he just landed and told Hunter that "Everything is on the
21 go." Hochingnavong stated that he would, "confirm on the quality and" "what you talked
22 to me about and" "I'm gonna try to negotiate with them." Hochingnavong stated, "I'm
23 pretty sure like" "if we can prove that we can work and that ... everything is negotiable."
24 Hochingnavong also informed Hunter that "half of the stuff is from here and the other
25 half is from uh, west coast." Hunter told Hochingnavong, "Okay, just gotta be right"
26 (referring to the quality of the marijuana).

27 421. A review of the electronic intercepts for **TT17** showed that **TT17** received a
28 series of photographs in the form of multi-media messages from (425) 306-4138. These

1 images depicted what I know to be, through training and experience, buds of marijuana
2 held in a palm of a hand. I had latent print examiners examine the photographs. From one
3 photograph, they identified the fingerprints on the hand as that belonging to
4 Hochingnavong.

5 422. 425-306-4138 called **TT17** (session 1377). During the call, Hochingnavong
6 asked if Hunter saw the pictures. Hunter affirmed. Hochingnavong said "the real one"
7 "looks more frostier than" the picture. Hunter asked about the smell and asked if
8 Hochingnavong "smoke." Hochingnavong said he did not smoke and had quit.
9 Hochingnavong said the product was "fire" (of excellent quality) and had been "doing it
10 so long" that he could tell if "it was good or not." Hochingnavong said, "It is worth our
11 time." Hochingnavong stated, "This one for sure is on right now. We shouldn't have no
12 problem dumping this shit." The two discussed meeting the following day.

13 423. **TT17** later received a call from (850) 292-3108 (session 1384). UM3108
14 referred to Hunter as "Unc" (uncle). During the call, Hunter told UM3108 to "line your
15 liziks" (customers) "up too man. It's official." UM3108 said he would put them "in
16 motion." Hunter said he would be there (UM3108's location) on Monday.

17 424. On December 2, 2017, **TT17** sent a text message to 425-306-4138 reading,
18 "Just landed" (session 1442). Cell tower data indicated **TT17** was located in Atlanta,
19 Georgia. Then, 425-306-4138 called **TT17** (session 1450). Hunter discussed obtaining a
20 rental car and told Hochingnavong that he was about to get off the plane. Hochingnavong
21 said, "I got some sample ready" and said he would pick Hunter up at the hotel, informing
22 Hunter that he did not want to do anything at the hotel.

23 425. Later, 425-306-4138 called **TT17** (session 1478). Hochingnavong said,
24 "We just finished uh, package." "So we have, total of fifty-two" (pounds of marijuana).
25 Hochingnavong said he would return to the hotel and that he and Hunter "gonna figure
26 our, our detail."

27 426. Beginning on December 3, 2017, investigators intercepted numerous calls
28 over **TT17** of Hunter attempting to arrange distribution of the marijuana. Based upon cell

1 tower location data for **TT17**, this distribution occurred in the Pensacola, Florida area.
2 Based upon intercepted calls above, Hunter and Hochingnavong intended on selling the
3 marijuana for \$2,200 per pound. After several negotiations with different parties,
4 ultimately Hunter and Hochingnavong had to distribute the marijuana for significantly
5 less. Examples of the distribution are discussed below.

6 427. On December 3, 2017, investigators intercepted calls between **TT17** and an
7 unknown male (UM2653) using 850-291-2653. During session 1541, UM2653 called
8 **TT17** asking, "Where you at cuzzo." Hunter said that he was on his way to "Waffle
9 House" and was on the highway. Hunter stated he would arrive in five minutes. During
10 session 1543, UM2653 called **TT17**, informing Hunter that he "was trying to get the one
11 off you cousin." Hunter asked, "You got the money?" UM2653 affirmed, and Hunter said
12 he would pull back around. Based upon my training and experience, I believe these calls
13 indicated that Hunter distributed one pound of marijuana to UM2653.

14 428. On December 4, 2017, **TT17** called 850-292-3108 (session 1628). Hunter
15 told UM3108, "Tell your dude, that got on with the half yesterday, if he can try to get
16 on." "He might want to try to get on before it's all gone at that ticket, too." "Like, you
17 know, eighteen or seventeen five." Hunter conveyed an urgency telling UM3108 to say,
18 "Unc is trying to go" (return to the Seattle area). UM3108 told Hunter, "I might tell
19 seventeen so he can get movin' on it." Hunter said, "Tell him seventeen five" (\$1,750 per
20 pound).

21 429. Shortly thereafter, 850-292-3108 made a return call to **TT17** (session 1629).
22 Hunter asked, "What's up neph?" UM3108 said, "Yeah, Rod said he would take twelve.
23 He wanted know if you can come to my mama's house" "Because he stays down the
24 street from us." Hunter said, "Yeah, I'm about to go get them, and come over there."
25 Hunter asked, "What did you tell him, seventeen-five?" UM3018 stated, "I told him
26 seventeen." Hunter stated, "We wanted seventeen-five, but it's cool. Just as long as he
27 comes get the other twenty with the, you know what I mean, soon. But we'll talk when
28 we get over there, we will be over soon."

1 430. Later, 850-292-3108 called **TT17** (session 1644). Hunter referred to
 2 UM3108 as "Nephew." UM3108 asked, "Did he come through?" Hunter informed
 3 UM3108 that "He got twenty." "He said he would dump them and get back" "with us."
 4 Hunter stated, "Hopefully, he get them other twenty-six and we be good."

5 431. Hochingnavong using 425-306-4138 called **TT17** (session 1661). During
 6 the call, Hochingnavong told Hunter that he spoke to the "boss" and the boss said that
 7 they had to do what they "got to do to go home." Hochingnavong said "he" (the boss)
 8 trusted them now. Hochingnavong said he was told, "ATL" (Atlanta) "now belong to
 9 you." Hochingnavong stated he was told that they were guaranteed "all the purple" being
 10 cut "next round." "We bring it down here." "We can get a solid twenty-two for this if it
 11 looks good, bro." "That's where were going to eat." The two continued to talk about
 12 future goals and business regarding their drug trafficking in the area.

13 **CHRYAR MITCHELL**

14 **Associated Locations: 1028 South Meyers Street, Tacoma, Washington**
 15 **2132 South 250th Street, Kent, Washington**

16 **Associated Vehicles: Blue Audi Q5 (ARL6025)**
 17 **Gray Volkswagen Passat (BHK7700)**
Black Chevy Tahoe (BKA4496)

18 432. Based upon intercepted calls, I believe Mitchell is involved in the
 19 trafficking of marijuana with Danavian Hunter. Discussed below, Chryar Mitchell was
 20 identified using TT66 for which a tracking warrant was authorized. Investigators
 21 identified Mitchell as the user of TT66 both while conducting surveillance
 22 contemporaneously with intercepted calls and while conducting physical surveillance in
 23 conjunction with GPS data for TT66. TT66 is subscribed to Mitchell. According to T-
 24 Mobile, Mitchell provided address **2132 South 250th Street, Kent, Washington** as his
 25 address. GPS data indicated that TT66 is often in the vicinity of **1028 South Meyers**
 26 **Street, Tacoma, Washington**. GPS data also indicates that TT66 is sometimes in the
 27 vicinity of **2132 South 250th Street**.

28 ///

1 ***November 14, 2017: Mitchell supplies Hunter with marijuana***

2 433. On November 14, 2017, Hunter using **TT17** received a call from Mitchell
3 using TT66 (session 517). During the call, Hunter said he was at home and he needed the
4 “pert” and “glue.” Based upon my training, experience, and knowledge of this
5 investigation, I know that Hunter was referring to strains of marijuana. Mitchell told
6 Hunter he was turning around. Believing Mitchell was going to Hunter’s apartment,
7 investigators went to the area of **28623 Military Road South, Apartment C24**, Federal
8 Way, Washington. At approximately 11:48 a.m., TT66 sent a text message to **TT17**
9 (session 522) which read, “20 min” (minutes).

10 434. At approximately 12:12 p.m., investigators observed a **blue Audi Q5**
11 (**ARL6025**) arrive and park in the parking lot of **28623 Military Road South**. At
12 approximately that same time, TT66 called **TT17** (session 525). Hunter and Mitchell
13 acknowledged seeing each other. Immediately after the call, investigators observed
14 Mitchell (identified from his driver’s license photograph) exit the Audi and walk into the
15 courtyard area of the complex and out of sight.

16 ***January 17, 2018: Surveillance at 2132 South 250th Street***

17 435. On January 17, 2018, investigators went to **2132 South 250th Street**, in
18 Kent, Washington. This address is listed on Mitchell’s driver’s license. While conducting
19 surveillance, investigators observed a beige Kia Sorento (AUK1352) registered to Chryar
20 Mitchell at this address arrive and park in the driveway. Investigators saw a subject with
21 similar height and weight to Mitchell get out of the car and go inside the house.
22 Investigators could not positively identify this individual.

23 ***February 27, 2018: Hunter and Mitchell discuss marijuana***

24 436. On February 27, 2018, TT66 called **TT17** (session 3242). During the call,
25 Mitchell asked what Hunter thought was “a good ticket,” to which Hunter responded
26 “twelve” or “thirteen bucks.” Mitchell acknowledged and told Hunter he “could squeeze
27 that thirteen out” of Mitchell. Hunter agreed and explained he had two nephews coming
28 in and would “probably grab about four or eight of them” depending on what his nephew

1 was "going to do." Mitchell stated he had "them too." Hunter also had another person
2 locally who "might want to grab one" "if it's right," but Hunter wanted to come "get a
3 sample of it" first. Mitchell agreed, and the two men planned to meet later that night.

4 437. Based on my training and experience, I believe Mitchell is a source of
5 supply of marijuana to Hunter. I know that a pound of marijuana in the Seattle area can
6 be sold for \$1,200 to \$1,300 per pound. I believe Mitchell wanted to know what Hunter
7 was willing to pay per pound of marijuana. After the two agreed on a price, Hunter
8 explained to Mitchell the quantity of marijuana he wanted: four or eight pounds of
9 marijuana for his nephews and one pound for a local customer.

10 ***May 2018: Surveillance at 1028 South Meyers Street, Tacoma, Washington***

11 438. On May 5, 2018, investigators observed a **gray Volkswagen**
12 **Passat (BHK7700)** parked in the driveway at **1028 South Meyers Street**. Investigators
13 returned later in the day, finding the Passat parked on the street behind a **black Chevy**
14 **Tahoe (BKA4496)** registered to Mitchell at **2132 South 250th Street**. Investigators saw
15 Mitchell walk from behind the house and get into the Tahoe and depart. GPS data
16 indicated that TT66 also departed and traveled to **2132 South 250th Street**.

17 ***May 2018: Surveillance at 2132 South 250th Street, Kent, Washington***

18 439. On May 7, 2018, GPS data indicated TT66 was in the vicinity of **2132**
19 **South 250th Street, Kent, Washington**. Investigators went to that location and saw the
20 **gray Volkswagen Passat (BHK7700)** in the driveway. A beige Kia Sorento (AUK1352)
21 was at that address was parked on the property. Investigators saw Mitchell exit the front
22 door of the residence and appear to lock the door using a key. Mitchell got into the Passat
23 and pulled out of the driveway.

24 ***Most Recently at 1028 South Meyers Street***

25 440. Tacoma Public Utilities identified Angel Garcia as the utility customer at
26 **1028 South Meyers Street**. Angel Garcia is the registered owner the **blue Audi Q5**
27 **(ARL6025)** driven by Mitchell.

441. On May 21, 2018, investigators saw the **black Chevy Tahoe (BKA4496)** parked in the driveway. GPS data indicated that TT66 was at this location during overnight hours on May 21, 2018.

Most Recently at 2132 South 250th Street

442. A review of currently available toll data indicates **TT17** used by Danavian Hunter has been in contact with TT66 as recently as May 3, 2018. On May 21, 2018, investigators saw the beige Kia Sorento (AUK1352) at **2132 South 250th Street**. Mitchell lists this address on his driver's license.

DANAVIAN HUNTER

Associated Locations: 28623 Military Road South, Apartment C24
Federal Way, Washington

Associated Vehicles: Silver Honda Odyssey (Florida 7151IA)²²
White Honda Odyssey (Florida ECIT67)²³
Gray Lexus ES (BHJ4065)²⁴

443. **TT17** is subscribed to Danavian Hunter. As previously discussed, investigators wiretapped **TT17** after intercepting **TT17** over **TTI** (discussed below).

September 2017: The "Pitch Off"

444. On September 11, 2017, investigators observed Michael Morgan, identifying him from his driver's license photograph, exit Crystal Barquet's apartment at **13045 Southeast 26th Street, Apartment B103** in Bellevue. Morgan was carrying a backpack and two plastic bags. One of the plastic bags contained a box. Morgan departed in a black Honda Civic.

445. **TTI** made an outgoing call to **TT17** (session 222). Morgan said, "What you gonna be doin' [AUDIO GLITCH] holler at you bout some shit." Hunter responded, "Alright, I'll be free. Where you at?" Morgan responded, "Ummm. I'm out in the U-

²² This vehicle is also discussed in the section regarding Wiggins.

²³ This vehicle is also discussed in the section regarding Wheeler.

²⁴ This vehicle is also discussed in the section regarding Hockingnavong and Herold.

1 district. I gotta go to this appointment real quick. But then after that I'll get wit you."

2 Hunter said, "Alright. Alright yea, call me after you get done."

3 446. When GPS data indicated that **TTI** was in the vicinity of the Riverside
4 Casino in Tukwila, investigators went to that location. While there, **TTI** called **TTI7**
5 (session 228). During the call, Morgan said he was trying to "bump into" Hunter. Hunter
6 responded, "I mean, you can pull up on me if you need me." Hunter said he was "by the
7 Red Apple" on "13th." Morgan said he would call back in fifteen minutes. Additional
8 investigators went to the Hilltop Red Apple at 2701 Beacon Avenue South in Seattle,
9 which is near 13th Avenue South.

10 447. At the Riverside Casino, the same detective who observed Morgan depart
11 Barquet's apartment parked in the parking lot of the Riverside Casino. Morgan pulled up
12 and angled his black Honda Civic behind the detective. The detective rolled down his
13 window. Morgan asked, "Have you seen me a couple of times today?" The detective
14 asked if he almost hit (as in almost collided with) Morgan and apologized. The detective
15 then left the area. Afterwards, **TTI** called **TTI7** (session 229). During the call, Hunter
16 provided his location and gave Morgan the address of 1803 13th Avenue South.

17 448. Investigators arrived at 1803 13th Avenue South in south Seattle.
18 Investigators saw Hunter, identified from his driver's license photograph, and another
19 male at that location. A few minutes later, Morgan arrived in the black Honda Civic.
20 Morgan got out of the black Honda Civic carrying the bag containing the box he carried
21 from **13045 Southeast 26th Street, Apartment B103**. Morgan handed the bag to Hunter
22 who placed it into a **white Honda Odyssey (ECIT67)**. After several minutes, Morgan
23 departed in the black Honda Civic.

24 449. After this point, all incoming calls to **TTI** went unanswered for several
25 days. Morgan did make an occasional outgoing call, and after September 15, 2017,
26 Morgan did occasionally answer an incoming call. Ultimately on September 28, 2017, it
27 appeared Morgan discontinued service for **TTI**. The intercept system no longer
28 intercepted ring tones when calls were placed to **TTI** and a recording by the carrier

1 informed incoming callers to **TTI**, "The number you are trying to call is not reachable
2 PTS6180."

3 450. Returning to September 11, 2017, after collecting the bag from Morgan,
4 Hunter traveled from south Seattle to Lynnwood. In Lynnwood, Hunter stopped at a
5 Dick's Drive In and ate in his vehicle. Upon departing, investigators followed Hunter for
6 more than twenty minutes. While investigators followed, Hunter drove in circles, looped
7 blocks, drove the same road in opposite directions several times, and conducted an illegal
8 U-turn. Based upon my training and experience, I believe that Hunter detected or
9 attempted to detect law enforcement presence. Eventually, Hunter traveled to Morgan's
10 residence on Poplar Way. Upon arriving at the Poplar Way residence, **TTI7** made several
11 calls to **TTI**, but none were answered.

12 451. As discussed, Morgan had stopped accepting incoming calls on **TTI** for
13 several days and ultimately completely discontinued the use of **TTI**. Based upon my
14 training and experience, and in context of the physical surveillance discussed in this
15 Affidavit, I believe Morgan stopped accepting incoming calls on **TTI** due to
16 compromised law enforcement surveillance. I believe that since Morgan believed he was
17 under law enforcement surveillance, Morgan contacted Hunter to pass off contraband or
18 drug currency in Morgan's possession. I believe Hunter then engaged in counter
19 surveillance activities until he believed he was not being followed by law enforcement
20 and then traveled to Morgan's residence with the bag containing the box handed off to
21 him by Morgan.

22 452. On September 15, 2017, **TTI** called 412-427-5090 (session 519). Morgan
23 spoke to another male subject. The two greeted and Morgan said, "I haven't had this
24 phone. I left this phone at home when I was gone for a few." The other party said, "Ah
25 nah. It's all good."

26 453. Morgan then said, "Yup. Yup. Yup. Yup. Shit, everything was everything,
27 immediately. So, I don't know. I didn't... I did not ... I had ...uh. I just, uh. I ran the
28

1 pitch off, so. I don't know. I'ma hit you probably in a little later. I'll call you a little later
2 on and shit." The other party said, "Alright."

3 454. Based upon the timing and context of the above discussed calls and related
4 physical surveillance, I believe that when Morgan referred to "everything was
5 everything," he meant everything was going fine as regards with his drug trafficking
6 activities on September 11, 2017. When Morgan was referring to running the "pitch off,"
7 I believe that Morgan was referring to passing drug proceeds or drugs to Hunter after he
8 spotted law enforcement surveillance.

9 ***October 2017: Surveillance at 28623 Military Road South***

10 455. On October 1, 2017, investigators located a **silver Honda Odyssey**
11 **(Florida 7151IA)**²⁵ registered to Hunter parked backed against a wall in the south
12 parking lot **28623 Military Road South**, in Federal Way, Washington. Investigators also
13 located a **white Honda Odyssey (Florida ECIT67)** parked in the north lot. This vehicle
14 was also backed into a spot up against a wall.

15 ***November 2017: Hunter and Morgan discuss drug trafficking***

16 456. During the interception of **TT17**, investigators intercepted **TT40**. I
17 recognized Morgan's voice as the user of **TT40**. Hunter using **TT17** and Morgan using
18 **TT40** discussed their future drug trafficking activity and Hunter's drug trafficking
19 activity with one of Hunter's nephews. The following call occurred before the above
20 described trip to Atlanta and Pensacola. I believe one of the nephews traveled from
21 Florida to Washington to meet with Hunter in anticipation of the above-described drug
22 trafficking activity. Morgan and Hunter discussed the nephew while the nephew was in
23 Washington.

24
25
26
27
28 ²⁵ The vehicles do not have front license plates. Investigators could not see the rear license plates because of how the vehicles were parked. Investigators later determined the license plates of these vehicles.

1 457. On November 8, 2017, Hunter using **TT17** received a call from Morgan
2 using **TT40** (session 195). During the call Morgan stated he was still at the hospital.
3 Danavian asked how the baby was doing. Morgan said "it's cool."

4 458. Morgan asked "What's up with Railen." Hunter said he saw Railen
5 (Wheeler) last night. Hunter said he tried calling Wheeler's phone and it was ringing at
6 first, and the other one, the family phone, went on first ring. The two started to talk about
7 Wheeler's and Hunter's significant others, "Deantre" being in jail, possible sentencing,
8 and possible federal charges for a firearm. They discussed the health of relatives and
9 Morgan having a premature baby. This call was minimized numerous times during the
10 session.

11 459. Towards the end of the call, right after a minimized section of the call,
12 Morgan stated, "As soon as I get done with all this shit and get them guys set up, we're
13 going to punch we gonna trip." "I just can't, I can't go nowhere right now."

14 460. Hunter responded, "It's good, man, we waitin', man. I am just waiting on
15 you, man. You know what I am saying, I am ready to do what we need to do, I just been
16 trying to, kinda do that. You know, get my ends up, to be able to do everything I need to
17 do and make everything's cool back this way."

18 461. Based upon my training, experience, and knowledge of this investigation, I
19 believe that Morgan's girlfriend, Kimberly Guadalupe, recently had a baby with Morgan.
20 Because of this, Morgan has not recently engaged in drug trafficking. I believe that
21 Morgan was informing Hunter that when he got his family situation settled, he was going
22 to get back to his trafficking activities. Hunter stated that he was waiting for Morgan and
23 was ready to work with him. I believe that when Hunter referred to "we" he was referring
24 to himself and Wheeler.

25 462. Morgan asked, "You been gettin' bread?" Hunter affirmed. Morgan said,
26 "That would definitely help." Hunter said, "You know it been cool. It's been real cool, so
27 I'll talk to you whenever I see you." Based upon my training and experience, I believe
28

1 "bread" was a reference to drug proceeds. I believe Morgan was expressing that Hunter's
2 access to the proceeds "would definitely help" in their future drug trafficking activities.

3 463. Hunter invited Morgan out and said he was with "Little nephew." Morgan
4 "You said your nephew? Whose nephew?" Hunter said, "Little nephew. That was with
5 us. That came" [unintelligible] "with us." Hunter clarified, "Little Bobby. Little B."
6 Morgan asked, "He's here?" Hunter affirmed and said, "He came to town to politics with
7 me." Morgan asked "Did he pay you?" and laughed. Based upon my training and
8 experience, I believe that "politics" was a reference to Hunter and his nephew negotiating
9 future drug trafficking activities. I also believe that Morgan was referring to a past drug
10 debt owed by the nephew.

11 464. Hunter said, "Yeah" "He's cool, he's definitely going be" "an asset there."
12 "He's got some things going on, for real for real now." Morgan asked, "Is he serious or
13 what? Is he pump faking?" Hunter said, "Nephew is ain't pump faking. Not at all, he's
14 serious." "He's doing it like, they got nice little thing, him and dude, the other dude that I
15 used to work with." Hunter stated, "They really got the key to the city down there so you
16 know, we'll be alright, whatever we decide to do, you feel me?" Hunter continued, "Yeah
17 like, you know like, for reals, you can be confident that it's gonna" "do what it does. It's
18 over with."

19 465. Morgan said, "Tell" him "don't sell his self short for a couple bucks"
20 "when there's a whole lot of money in his way." Hunter said, "Nah" "I think he just went
21 through a situation. He got it back. He did what he could, and made it happen." "I mean,
22 it just took a minute for him but, but you know, I got still got confidence in him, you
23 know what I mean?" "He's been really been doing it, like, for real." "You know, with
24 me, man. It's been one thow-wow," (\$1000) "ten thow-wow," (\$10,000) "you know so."
25 The two then talked about meeting later.

26 466. Based upon my training and experience, I believe that Hunter was vouching
27 for his nephew, and "the keys to the city" is a reference to the nephew's ability to
28 distribute drugs in the Pensacola, Florida area discussed above.

1 467. Approximately two hours later, **TT17** sent a text message to **TT40** reading,
2 "Pullen up" **TT40** responded, "I can't make it I'll hit u in min or the am."

3 468. Based upon my training and experience, I believe that Hunter sent a text
4 message to Morgan indicating his intent to meet Morgan in person and would have likely
5 continued their discussion regarding Hunter's nephew. Based upon Morgan's response,
6 Morgan was unable to meet.

7 469. On December 5, 2017, **TT40** called **TT17** (session 1710). This call occurred
8 while Hunter was in Florida. At the beginning of the call, Morgan said, "Don't get rich
9 and forget about your family." Morgan and Hunter laughed. Morgan said, "I'm checking
10 on you." Hunter responded, "Man, I sure appreciate it man. I'm so glad that you called
11 and checked on your lonely cousin." Morgan asked Hunter what he has been doing.
12 Hunter said, "I haven't been doin' nothing but you know I had to step down for a second,
13 quick little second right quick." Morgan asked, "Oh you cut out?" Hunter affirmed.
14 Morgan asked, "How did it go?" Hunter said, "Oh man, I'm not back." "I'm" "still
15 working." "But it's going cool though."

16 470. Morgan asked, "You found the play or what?" (successful drug
17 transaction). Hunter said, "Man, yep. I mean I did." Hunter said, "I'm just out here
18 working man, trying to make it happen right quick and show them what it is." Morgan
19 asked, "They brought it to you?" (arranged for the transportation of the drugs). Hunter
20 said, "Yep." "I'm gonna talk to you about it when I get there." "I'll tell you about it and
21 then you know we'll figure it out from there. You know what I'm sayin'."

22 471. Based upon my training and experience, I believe that Hunter arranged
23 these transactions occurring in Atlanta and Pensacola on his own and that Morgan and
24 Hunter would be arranging future transactions together.

25 ***May 2018: Surveillance at 28623 Military Road South, Apartment C24***

26 472. On May 8, 2018, investigators saw the **gray Lexus ES (BHJ4065)** parked
27 in a spot marked "**C24**" at **28623 Military Road South, Apartment C24**. Investigators
28

1 saw the **white Honda Odyssey (Florida ECIT67)** arrive and park. Investigators saw
 2 Hunter come from the Odyssey and walk toward **Apartment C24**.

3 ***Most Recently***

4 473. On May 11, 2018, PSE identified Danavian Hunter as a utility customer for
 5 **28623 Military Road South, Apartment C24**. Hunter also lists this address on his
 6 driver's license. On May 22, 2018 investigators saw the **gray Lexus ES (BHJ4065)**
 7 parked in the lot of **28623 Military Road South**.

8 **Wiretaps of Joseph Wilson and Calvin Thomas**

9 474. Investigators obtained authorization to wiretap **TT4** used by Joseph Wilson
 10 after conducting a controlled purchase of cocaine from Wilson (previously discussed).
 11 Investigators also intercepted Wilson over **TT46** being supplied by Charles Cheatham.
 12 Interception of **TT4** revealed that Wilson is a distributor of cocaine. Based upon
 13 confidential source information (CS2), investigators believed Morgan was a source of
 14 supply of cocaine for Wilson. During interception of **TT4**, investigators learned that
 15 Calvin Thomas using **TT21** was supplying cocaine to Wilson during the interception
 16 period. As previously discussed, investigators intercepted Ernie Davis over **TT4**.
 17 Investigators later learned that Railen Wheeler using **TT6** and **TT41** was a source of
 18 supply for both Wilson and Thomas.

19 **WALTER ROBINSON**

20 **Associated Locations:** No associated locations sought

21 **Associated Vehicles:** Blue Chevrolet Tahoe (BFR8025)

22 475. Based upon intercepted calls over **TT4**, I believe that Robinson is a source
 23 for firearms for Joseph Wilson. Both Robinson and Wilson are convicted felons.
 24 Discussed below, Walter Robinson was identified using 360-402-0254 during physical
 25 surveillance conducted contemporaneously with intercepted calls. The phone is
 26 subscribed to "Walker" Robinson.

27 ///

28 ///

1 ***September 2017: Discussions about firearms***

2 476. On September 8, 2017, Wilson using **TT4** received a text message from
3 Robinson using 360-402-0254 (session 119) which read, "Ask your boy if he want it
4 320."

5 477. Later, **TT4** called 206-446-1463 subscribed to Charles Kendrick (session
6 201). Wilson asked, "Did you still want one of them things, one of them toys?" Kendrick
7 said, "Yeah, kinda." Wilson said, "If not it's not a big deal" "but my cousin got one." "A
8 little forty." Kendrick said, "What does he want for it though." Wilson said, "He want
9 like three hundred, three twenty, something like that." Kendrick said he was about to take
10 a trip and wasn't ready "right this second." Based upon my training and experience, I
11 know that "toy" in this context refers to a firearm. I believe that Robinson was trying to
12 sell a firearm to Wilson, who in turn was trying to sell the firearm to Kendrick.

13 478. On September 12, 2017, **TT4** sent a text message to 360-402-0254 reading,
14 "Still got that thang? Need it." 360-402-0254 replied, "Which. One." **TT4** responded,
15 "The 40 my guy want it." 360-402-0254 replied, "The one had the other day was the
16 bitches and I sold it for her what he trying to spend I'll call her back she had like 5 or 6
17 thangs." **TT4** responded, "He jus need somethingfat." (Sessions 972, 993, 995, 997 and
18 999.) Based upon my training and experience, I know "40" refers to a .40 caliber
19 handgun. I believe that Robinson informed Wilson that he already sold that firearm, but
20 had access to others. I also believe that the reference to needing "somethingfat" is likely a
21 reference to a high quality larger caliber firearm.

22 479. Later the same day, **TT4** called 360-402-0254. Wilson said, "They back out
23 here biting in Kirkland man." Robinson said, "I'm about to leave work. I'm about to
24 come over there." GPS data for **TT4** indicated Wilson was at the Homeport Marina in
25 Kirkland. Almost an hour later, investigators observed Robinson (identified by his
26 driver's license photograph) arrive at the marina in a **blue Chevrolet Tahoe (BFR8025)**
27 registered to Robinson. Robinson got out of the Tahoe with fishing gear and met Wilson
28 on the dock. A few minutes later, Wilson walked to his blue Dodge Charger and sat in the

1 driver's seat for about a minute. Wilson then returned to the dock. The two departed
2 approximately two hours later.

3 480. On September 15, 2017, **TT4** called 360-402-0254 (session 1707). Wilson
4 asked for a third party's phone number. Robinson told Wilson his friend had been shot
5 twice in the leg.

6 481. A few days later, on September 18, 2017, **TT4** received a text message
7 from 360-402-0254 (session 3123) reading, "You ain't trying to sell me that thang back
8 huh." **TT4** responded, "I will I just need something tho." 360-402-0254 replied, "Yea I
9 need that on payday or something this south end" dude "beefin hard pulled up and let
10 some shots off at me." **TT4** replied, "Wtf" "Who." 360-402-0254 responded, "I think it
11 was" "Monroe fro. Hoover." Based upon this exchange, I believe that Robinson was
12 attempting to have Wilson sell a firearm back to him because someone had shot at him
13 recently. Based upon my training and experience, I know "Hoover" is a reference to the
14 74 Hoover street gang.

15 482. On September 19, 2017, 360-402-0254 sent a text message (session 3291)
16 to **TT4** reading, "Man can I give you this 100 and give you the rest Thursday for the
17 thang and I can have lil cuddy go in the store or something for a brand new one." **TT4**
18 responded, "I didn't bring it I'm at work ... I need another thang too or imam be naked
19 fam." 360-402-0254 responded, "O yup it's coo." Based upon this exchange, I believe
20 that Robinson again was trying to buy back a gun from Wilson, but Wilson is reluctant
21 because that would leave Wilson without a gun ("naked").

22 ***Most Recently***

23 483. A review of currently available toll data indicates **TT4** used by Wilson has
24 been in contact with 360-402-0254 as recently as April 16, 2018. The **blue Chevrolet**
25 **Tahoe (BFR8025)** is currently registered to Robinson.

26 ///

27 ///

1 **JOSEPH WILSON**2 **Associated Locations: 3725 South 168th Street, SeaTac, Washington**3 **Associated Vehicles: Maroon Honda Accord (BIF4770)**

4 484. Joseph Wilson using **TT4** was the subject of a wiretap in September of
 5 2017. Investigators obtained authorization to intercept **TT4** after making a controlled
 6 purchase of cocaine from Wilson using **TT4**. Previously discussed, investigators
 7 conducted a controlled purchase of four-and-a-half ounces of cocaine (a "baby") from
 8 Wilson. Also previously discussed, investigators seized two handguns from Armstrong, a
 9 subject Wilson was supplying with cocaine. Wilson has also been intercepted using **TT4**
 10 during interception of **TT6** used by Wheeler, **TT40** used by Morgan, and **TT46** used by
 11 Cheatham.

12 ***February 2018: Wilson requests "nino" (9 ounces of cocaine) from Wheeler***

13 485. On February 23, 2018, Wheeler using **TT6** received a call from Wilson
 14 using **TT4** (session 1822). During the call Wilson said, "I need you." "I'm gonna come
 15 get a few." Wheeler said, "I need my eight fifty man. I'm not going to answer the phone."
 16 Wilson said, "I'm not getting one man." "You just told me last night you wasn't charging
 17 me that." Wheeler said, "Eight twenty five." Wilson said, "I'm about to come get the
 18 nino. You said you'll give me the nino for the seventy two." "That's what you told me
 19 last night." Based upon my training and experience, I believe that Wilson requested nine
 20 ounces of cocaine for \$7,200.

21 486. Later that evening, **TT6** called **TT4** (session 1878). Wilson said he was on
 22 the way. Wheeler said, "Meet you at the Roman." "What did you want?" Wilson
 23 responded, "The nine."

24 ***February 2018: Wilson requests a "baby" (4½ ounces of cocaine) from Wheeler***

25 487. On February 27, 2018, **TT6** called **TT4** (session 2572). During the call
 26 Wilson said, "I need you still too man." Wheeler asked, "What you want?" Wilson said,
 27 "I need the baby. I might need more. I got more money now." "I might get the nino."
 28

1 Later, **TT6** called **TT4** (session 2583). Wheeler told Wilson he was “at the Roman.”

2 Wilson said, “I’ll be out there.”

3 488. At approximately 9:41 pm, **TT4** called **TT6** (session 2602). Wilson said,
4 “I’m coming up there.” Wheeler asked, “What was you trying to do yo?” Wilson said, “I
5 told you I was getting the baby.” Wheeler said, “I’m about to go grab it and come back.”

6 489. Approximately forty minutes later, investigators saw a **maroon Honda**
7 **Accord (BIF4770)** registered to Joseph Wilson arrive in the parking lot of Roman
8 Casino. Investigators saw Wilson (identified from his driver’s license photograph) get out
9 of the Accord and go inside the casino. Close to half an hour later, investigators saw
10 Wilson and Wheeler come out of the casino and get into the Accord. They departed and
11 investigators did not follow. A little more than half an hour later, the Accord returned.
12 Wheeler got out and returned to the casino. The Accord departed.

13 ***March 2018: Wilson order 3 ounces from Cheatham***

14 490. On March 10, 2018, Cheatham using **TT46** received a text message from
15 **TT4** reading, “Need to holla at u” (session 2187). Later **TT46** called **TT4** (session 2206).
16 Cheatham asked “What you talking about?” Wilson said, “Just like a little three piece.”
17 Based upon my training, experience, and knowledge of this investigation, I believe that
18 Wilson was requesting three ounces of cocaine. During session 2208, the two agreed to
19 meet at a Chevron gas station on Pacific Highway South.

20 491. Later, **TT46** called **TT4** (session 2248). Cheatham said, “That stack with
21 the fifties and hundreds was twenty dollars off.” Wilson asked, “Did you double count
22 man?” Cheatham said he would count again and started counting. Cheatham said, “It was
23 twenty four twenties and the rest were the fifties and the hundreds.” Wilson said he
24 would pay Cheatham back next time.

25 ***May 2018: Surveillance at 5301 Talbot Road South, Apartment P102***

26 492. On May 8, 2018, GPS data indicated **TT4** was in the vicinity of 5301
27 Talbot Road South Apartment P102, Renton, Washington. Investigators went to that
28 location and saw a silver Lexus with a temporary paper tag in the window parked in the

1 driveway. Investigators saw Wilson come out of the apartment and move the silver Lexus
2 out of the driveway for construction workers that were working on the apartment
3 complex. Wilson parked the silver Lexus a short distance away and walked back into the
4 residence.

5 ***Mid-May 2018: Wilson moves to 3725 South 168th Street***

6 493. Since May 13, 2018, GPS data indicated that TT4 was staying overnight at
7 **3725 South 168th Street**, SeaTac, Washington. On May 15, 2018, when GPS data
8 indicated **TT4** was at this location, investigators went to the residence and saw a gold
9 Lexus without license plates parked on the property. Investigators saw Wilson exit the
10 house and depart in the gold Lexus. GPS data showed that **TT4** departed as well.
11 According to PSE, Wilson became a utilities customer at this location on May 12, 2018.

12 ***Most Recently***

13 494. A review of currently available toll data indicates **TT4** has been in contact
14 with TT47 used by Morgan as recently as May 4, 2018. On May 21, 2018, investigators
15 saw the gold Lexus without license plates parked in the driveway at **3725 South 168th**
16 **Street**. GPS data indicates that **TT4** is consistently in the vicinity of this address during
17 overnight hours, including on the night of May 21, 2018.

18 **CALVIN THOMAS**

19 **Associated Locations: No associated locations sought**

20 **Associated Vehicles: No associated vehicles sought**

21 495. Calvin Thomas using **TT21** was the subject of a wiretap in November of
22 2017. Investigators obtained authorization to intercept TT21 after intercepting TT21 over
23 **TT4** used by Wilson. Investigators do not know the current whereabouts of Thomas.
24 Below are example calls involving Thomas (identification discussed above at paragraph
25 44).

26 ***November 2017: Wilson obtains two ounces from an unidentified female***

27 496. On November 7, 2017, Thomas using **TT21** called an unknown female
28 (UF5457) using 206-353-5457 (session 328). Thomas asked if UF5457 had anything for

1 him. UF5457 said yes and that she would call him back. Later **TT21** called (session 359)
2 206-353-5457. Thomas and UF5457 agreed to meet at "Tony's shop." Thomas asked,
3 "What you got for me?" UF5457 told Thomas she had "two ounces" (unknown
4 substance). Thomas said he wanted to know if he needed to "gather up some dough"
5 (money). UF5457 told Thomas she wanted a "little thing" (possibly a firearm). Thomas
6 told UF5457 he was "working on" it.

7 497. Investigators monitored video surveillance in the area of All In The Cut, a
8 barbershop located in south Seattle. Video surveillance showed Thomas arrive in a green
9 F150 pickup. Thomas, after being greeted by a couple of subjects, went into the
10 barbershop. Thomas and a female in her fifties exited the barbershop. The female
11 appeared to grab something from within her shoulder bag and gave the object to Thomas
12 as they walked to Thomas's green F150. Thomas could be seen holding a white object,
13 possibly something wrapped in a white plastic bag. The female walked Thomas to the
14 green F150. Thomas got into the driver's seat, and the female spoke to Thomas while
15 standing near Thomas who left the driver's door open. After a few moments, the female
16 got into a gray Buick and departed. Thomas also departed in the green F150.

17 ***November 2017: Thomas spots law enforcement surveillance***

18 498. On November 22, 2017, Thomas using **TT21** called an unknown male
19 (UM0281) using 817-681-0281. Thomas said he was riding with Rich and getting
20 furniture at Public Storage when he saw a "mutha fucking car role by with a mutha fucka
21 in there snapping pictures and shit man!" Thomas said he hadn't been doing anything so
22 they must have been taking pictures of Rich. Thomas accurately described the
23 investigator conducting surveillance that took the photographs and his vehicle. Thomas
24 said, "I know it ain't me." "But now somehow I got dragged in it." "They are going to
25 put my picture up with his" "Fuck." Thomas said, "I ain't did nothing." "I aint had no
26 work in a month and a half." Based upon my training and experience, I believe that
27 Thomas believed that law enforcement took his picture. Thomas believes that Rich is the
28 one who drew the attention of law enforcement. When Thomas made the reference to

1 “work,” I know based upon training and experience Thomas was referring to drugs for
2 sale.

3 499. Thomas made several other calls with different people regarding this
4 incident. During one call (session 1582), Thomas said, “I just accepted my faith.” “I ain’t
5 calling Rich no more.” “I think” he “is being watched.” “I ain’t getting caught up in that
6 shit.” Thomas said he told Rich, “They might got you tapped as the gateway to get to
7 whoever they want.” Thomas said, “If they is tapped into his line, they see how he doing
8 me.” “They” “don’t want to help Peanut” (Thomas was referring to himself as “Peanut”).
9 “We (law enforcement)” “can’t get him right now.” Thomas giggled. Thomas said he
10 spoke to “Railen” (Wheeler) some time back and Wheeler said Rich was “hot.” Based
11 upon my training and experience, I believe that Thomas believed that law enforcement
12 may have Rich’s line wiretapped.

13 **Drug Distribution by Railen Wheeler**

14 500. Investigators obtained authorization to wiretap *TT6* and *TT41* used by
15 Railen Wheeler after intercepting drug related calls over *TT17* used by Danavian Hunter.
16 Intercepted calls indicated that Wheeler’s source of supply for cocaine was Michael
17 Morgan. Wheeler also distributed heroin and facilitated the distribution of unlawfully
18 diverted pharmaceuticals.

19 **JAMES MAYERS**

20 **Associated Locations:** 4813 72nd Place Southwest
21 Mukilteo, Washington

22 **Associated Vehicles:** White Hyundai Sonata (AVX0558)
23 Red Chevrolet Camaro (AVF3570)

24 501. Based upon intercepted calls, I believe Railen Wheeler supplies Mayers
25 with cocaine. Discussed below, James Mayers was identified using TT48 which was
26 subject of a tracking warrant. Investigators identified Mayers as the user of TT48 both by
27 conducting physical surveillance contemporaneously with intercepted calls, and by
28 conducting physical surveillance in conjunction with GPS data for TT48. While not

1 extremely precise, GPS data for TT48 was often in the vicinity of **4813 72nd Place**
 2 **Southwest**, Mukilteo, Washington during overnight hours.

3 ***February 2018: Mayers requests a "baby" (4½ ounces of cocaine)***

4 502. On February 18, 2018, Wheeler using **TT6** received a call from Mayers
 5 using TT48 (session 906). Mayers said he was on his way and wanted "a little baby"
 6 (four and half ounce of cocaine). Over an hour later, TT48 called **TT6** (session 918).
 7 Mayers said, "I'm almost close." Wheeler said, "Meet me at the Roman's."

8 503. Investigators went to the Roman Casino in Skyway. There investigators
 9 saw the **black BMW 535 (AYV1075)** arrive. Wheeler came from the vehicle and went
 10 into the casino. TT48 called **TT6** (session 927). Mayers said he was five minutes away.
 11 TT48 again called **TT6** (session 928). Mayers said, "I'm out here." At about this time,
 12 investigators saw a **white Hyundai Sonata AVX0558** arrive and park. Wheeler came out
 13 of the casino and got into the Hyundai. Shortly thereafter, Wheeler got out of the Sonata
 14 and walked away. The Sonata departed.

15 ***February 2018: Mayers requests a kilogram of cocaine from Wheeler***

16 504. On February 14, 2018, **TT6** received a call from TT48 (session 289).
 17 Mayers asked, "How we lookin'?" Wheeler responded, "We straight." Mayers said, "I
 18 might need the whole thingnay." Wheeler asked, "What you say?" Mayers repeated
 19 himself. Wheeler said, "Just call me when you ready." Mayers asked, "What's the temp
 20 though?" Wheeler said, "Twenty-eight five." Mayers said, "Ok, yup" and something
 21 unintelligible. Based upon my training and experience, I believe Mayers requested one
 22 kilogram of cocaine. Wheeler quoted a price of \$28,500.

23 505. Less than fifteen minutes later, TT48 called **TT6** (session 290). During the
 24 call, Mayers said, "I told" him "that he gotta come to me." "So I'm just waiting for him"
 25 "to hit me back." "So I'll let you know but ... it might be for sho you know so" "I was
 26 just giving you an update." Wheeler asked, "They cool?" Mayers, "Yeah, it's cool."
 27 Wheeler asked, "It's your people?" Mayers said, "It's my people people." Wheeler said,
 28 "As long as you got the bread." Mayers said that he was going have his "people" come to

1 his location. Based upon my training and experience, I believe that Wheeler questioned
2 whether Mayers's customer was trustworthy, and expressed as long as Mayers's "people"
3 had the money ("bread"), Wheeler would supply Mayers.

4 506. Later, Morgan²⁶ using TT47 called **TT6** (session 295). Morgan and
5 Wheeler had a social conversation for several minutes and the call was minimized.
6 During a spot check of the conversation, Wheeler asked, "Where you at? Glad you called
7 me man. Hey, bring me a book." Morgan responded, "Fuck you man." Morgan then said,
8 "I got you." "I mean I can. I was about to go get Maya and take her out, but I can do
9 that." Wheeler said, "If you want to sell it." "I told him twenty-eight five. I'll just take the
10 five hundred. Just give you the twenty-eight." Wheeler interrupted himself, "Or twenty-
11 seven five." Morgan began interrupting, "I'm gonna call you. I'm gonna call you. I'm a
12 gonna call you when I get done."

13 507. Based upon my training and experience, I believe Wheeler contacted
14 Morgan to obtain a kilogram of cocaine referenced as the "book" and that Wheeler would
15 keep \$500 of the profit and give Morgan \$28,000. Wheeler then attempted to increase his
16 profits, by changing his story, informing Morgan that he quoted his distributor (Mayers) a
17 price of \$27,500. Here, based upon my knowledge of this investigation, Morgan began
18 interrupting Wheeler because Wheeler began to speak too specifically about the drug
19 transaction over the phone.

20 508. Late in the evening, TT47 called **TT6** (session 374). Morgan asked, "What
21 up with you?" Wheeler said, "Sitting here watching T.V. That dude never called me
22 back." Wheeler told Morgan that "he" was going to call back after dinner with his girl.
23 Morgan asked, "What you got going?" Wheeler said, "Waiting for the phone to ring."
24 Morgan asked, "How has it been going?" Wheeler said, "It's picking up." Morgan said,
25 "I wasn't even talking about that." The two went on to have a conversation about a third
26 party. At the end of the call, Wheeler said, "As soon as he's gonna call me, I'll call you."

27
28 ²⁶ I recognized Morgan's voice.

1 Morgan said, "That's cool." Based upon my training and experience, I believe that
2 Wheeler informed Morgan that Mayers had not called back and that Wheeler thought the
3 inquiry of "How has it been going?" was an inquiry about Wheeler's drug distribution
4 activity.

5 ***February 2018: Mayers requests "nina" (9 ounces of cocaine) from Wheeler***

6 509. February 24, 2018. **TT6** called TT48 (session 1924). During the call
7 Mayers said, "I'm gonna come pull up on you then." Wheeler asked, "What you trying to
8 do so I be ready." Mayers said, "Nina." Later, TT48 called **TT6** (session 1948). During
9 the call Wheeler said, "I'll meet you at Southcenter or something." "I'm about to go grab
10 it and then I'm on my way." Mayers said, "I'll be at the Bahamas." Wheeler asked,
11 "Bahama Breeze?" Mayers affirmed.

12 510. Investigators went to the Bahama Breeze located near Westfield
13 Southcenter Mall in Tukwila. There, investigators saw Wheeler arrive in a **gray GMC**
14 **Yukon (BIH2904)** and park. Wheeler went into Bahama Breeze. A little less than half an
15 hour later, investigators saw a **red Chevrolet Camaro (AVF3570)** arrive and park. At
16 approximately the same time, **TT6** received a call from TT48. Mayers said he was "right
17 in front of the door."

18 511. Wheeler exited the restaurant and got into the front passenger seat of the
19 Camaro. The Camaro drove to the Yukon. Wheeler got out of the Camaro and got into
20 the **gray GMC Yukon (BIH2904)**.

21 512. Both the Yukon and the Camaro departed. Investigators followed the **red**
22 **Chevrolet Camaro (AVF3570)**. The red Camaro traveled to a Chevron gas station in
23 Lacey, Washington. Mayers went into the convenience store. Investigators photographed
24 Mayers, and he was later identified after comparing his photograph with his driver's
25 license photograph.

26 ***March 2018: Surveillance of TT48***

27 513. On March 8, 2018, GPS data indicated TT48 was in the vicinity of the
28 Aspens at Belvedere apartments located in SeaTac, Washington. There investigators

1 located the **red Chevrolet Camaro (AVF3570)**. The red Camaro was parked next to a
2 black BMW. Investigators saw Mayers (identified from his surveillance photograph) get
3 out of the red Camaro and get into the passenger seat of the BMW. After a short period of
4 time, Mayers got out of the BMW and returned to the red Camaro. Mayers then departed
5 in the Camaro. Based upon my training and experience, and knowledge of this
6 investigation, I believe that Mayers conducted a drug transaction with the driver of the
7 BMW.

8 514. On March 14, 2018, GPS data indicated TT48 was in the vicinity of
9 Westfield Southcenter Mall. Investigators went to that location and located the **red**
10 **Chevrolet Camaro (AVF3570)** parked in one of the parking garages at the mall. While
11 watching the Camaro, investigators saw a **white Hyundai Sonata (AVX0558)** arrive and
12 park next to the Camaro. Investigators saw Mayers (identified from previous surveillance
13 photographs) get out of the front passenger seat of the Sonata and into the driver's seat of
14 the Camaro. Both vehicles left.

15 515. Investigators had a police patrol vehicle stop the **red Chevrolet Camaro**
16 **(AVF3570)**. Mayers showed officers his driver's license and provided TT48 as his phone
17 number.

18 516. On March 22, 2018, investigators located the **red Chevrolet Camaro**
19 **(AVF3570)** parked in the driveway of **4813 72nd Place Southwest**, Mukilteo,
20 Washington. GPS data indicated that TT48 was also in the vicinity.

21 ***May 2018: Surveillance at 4813 72nd Place Southwest***

22 517. On May 9, 2018, investigators saw Mayers come out of the front door of
23 **4813 72nd Place Southwest** with a child. Mayers walked the child to a nearby
24 elementary school. Mayer returned alone and went back into the house.

25 ***Most Recently***

26 518. A review of currently available toll data indicates **TT6** used by Wheeler has
27 been in contact with TT48 as recently as May 7, 2018. On May 22, 2018, investigators
28 observed the garage door open and watched Mayers exit the garage at **4813 72nd Place**

1 **Southwest.** Mayers walked around in the front yard and appeared to be inspecting the
2 grass.

3 **LEONARD HAYWOOD**

4 **Associated Locations: 907 Southwest 341st Street**
5 **Federal Way, Washington**

6 **Associated Vehicles: Black Dodge Charger (APK4646)**
7 **Black Chevy Camaro (AZW6725)**

8 519. Based upon intercepted calls, I believe Wheeler supplies Haywood with
9 cocaine. Discussed below, Leonard Haywood was identified using 206-271-9326 during
10 physical surveillance conducted contemporaneously with intercepted calls. This phone is
11 also subscribed to Haywood.

12 *November 2017: Thomas tries calling Haywood*

13 520. On November 6, 2017, Calvin Thomas using **TT21** called 206-271-9326
14 (session 282). Thomas hung up before anyone answered.

15 *February 2018: Haywood asks for a "zip of soft" (1 ounce of cocaine)*

16 521. On February 18, 2018, Wheeler using **TT6** received a call from Haywood
17 using 206-271-9326 (session 909). Haywood asked, "You got a zip of soft?" (one ounce
18 of cocaine). Wheeler said, "Yeah." Haywood asked, "How much?" Wheeler said, "Nine
19 hundred" (\$900). Haywood said, "I'm coming to get it." "I'm about call you when I get
20 the money together." "Less than ten minutes."

21 522. 206-271-9326 called **TT6** (session 911). Haywood said, "I just want half"
22 (a half ounce of cocaine). Wheeler said, "Five hundred" (\$500). Haywood asked, "Can
23 you meet me at WinCo?" Wheeler said, "WinCo where?" Haywood said, "Three forty ...
24 You know where I be at." Wheeler said he could not drive and said to meet "in the hood"
25 (Seattle Rainier Valley area). I am aware that there is a WinCo Foods in Federal Way just
26 a few minutes from Haywood's residence at **907 Southwest 341st Street**.

27 523. Later that evening, investigators saw Wheeler arrive at the Roman Casino
28 in a **black BMW 535 (AYV1075)**. Wheeler went into the casino. Six minutes later,

1 investigators saw a black BMW 650 (AXP5895) arrive and park. Haywood got out of the
2 driver's seat and went inside the casino. Ten minutes later, investigators saw Haywood
3 come out of the casino and go to the black BMW 650 (AXP5895). Haywood got into the
4 vehicle and drove out of the lot. Based upon my training and experience, I believe
5 Haywood obtained a half ounce of cocaine from Wheeler.

6 524. That evening, investigators viewed a Facebook photograph of Haywood,
7 identifying him as the driver of the black BMW 650 (AXP5895). Investigators later
8 obtained Haywood's driver's license photograph and confirmed that the Facebook
9 photograph depicted him.

10 ***March 2018: Haywood requests "one" from Wheeler***

11 525. On March 7, 2018, **TT6** called 206-271-9326 (session 4213). Haywood
12 said, "I'm leaving Federal Way right now." "I need one of them, uh I need one of them,
13 uh I need." Wheeler interrupted, "I'll talk to you when I see you." Later, 206-271-9326
14 called **TT6** (session 4265). Haywood asked where to meet. Wheeler said he would call
15 Haywood. Haywood said he was going to go to Spokane and "I need that tonight."
16 During a follow-up call (session 4293), the two agreed to meet at "Mo's."

17 ***April 2018: Surveillance at 907 Southwest 341st Street***

18 526. On the morning of April 26, 2018, investigators went to **907 Southwest**
19 **341st Street** and saw Haywood come out of the front door of the residence, smoke a
20 cigarette, and go back inside. Forty minutes later, Haywood came back out of the
21 residence with a dog and get into a **black Dodge Charger (APK4646)** registered to
22 Haywood and depart. Fifteen minutes later, Haywood returned in the vehicle and went
23 inside.

24 ***May 2018: Surveillance at 907 Southwest 341st Street***

25 527. On May 10, 2018, investigators went to **907 Southwest 341st Street** and
26 saw the Charger and a **black Chevy Camaro (AZW6725)** also registered to Haywood
27 parked in the driveway.

28 ///

Most Recently

528. A review of currently available toll data indicates **TT6** used by Wheeler has been in contact with 206-271-9326 as recently as April 24, 2018. On May 11, 2018, PSE identified Anna Lilly as utility customer for **907 Southwest 341st Street**. Anna Lilly is also listed as the registered owner along with Haywood for the **black Dodge Charger (APK4646)** and the **black Chevy Camaro (AZW6725)**.

529. On May 21, 2018, investigators observed the **black Chevy Camaro (AZW6725)** parked in the driveway partially under a car cover at **907 Southwest 341st Street**.

BOBBY BEASLEY

Associated Locations: **13313 Southeast 227th Place, Kent, Washington**

Associated Vehicles: **Maroon Chevrolet Impala (BHX9836)**
 Blue Buick Park Avenue (AWX3675)
 Gray Chevrolet Tahoe (AVP0293)

530. Based upon intercepted calls, I believe Wheeler supplies Beasley with cocaine. I also believe that Beasley is a source of supply for unlawfully diverted pharmaceuticals. Discussed below, Bobby Beasley was identified using 206-250-3607 while conducting physical and video surveillance contemporaneously with intercepted calls.

February 2018: Beasley requests an ounce of cocaine from Wheeler

531. On February 28, 2018, Wheeler using **TT6** received a call from Beasley using 206-250-3607 (session 2678). Beasley said, "I needed some some shit." Beasley also said, "I need you to bring it to me though cause" "I'm doing that shit." Wheeler agreed. Later, **TT6** called 206-250-3607 (session 2698). Beasley said that he needed Wheeler to bring "it" to Beasley's location. Wheeler asked, "What you trying to do?" Beasley said, "I need like a little bzall right quick or something." Beasley stated that he was moving, had a U-Haul, and needed to be finished soon. Beasley convinced Wheeler to come to his location. Based upon my training, experience and knowledge of this

1 investigation, I believe that a "bzall" is a play on the word "ball" which indicates one
 2 ounce of cocaine, or a shortening of "eightball," which indicates one-eighth of an ounce
 3 of cocaine.

4 ***March 2018: Beasley requests ½ ounce from Wheeler***

5 532. On March 13, 2018, **TT6** received a call from 206-250-3607 (session
 6 5274). Beasley said, "I need like half of one." Wheeler asked, "A half of what?" Beasley
 7 responded, "Ball." Wheeler said he would call when he got back to the south end. Later,
 8 **TT6** received a call from 206-250-3607 (session 5294). Beasley asked if Wheeler was
 9 back in the "south." Wheeler affirmed. Beasley said, "I'm about to pull up real quick."

10 533. Shortly thereafter, investigators observed, via remote video surveillance,
 11 the **maroon Chevrolet Impala (BHX9836)** drive by **8448 54th Avenue South**, then pull
 12 off to the side of the road and out of camera view. Investigators observed Beasley come
 13 from the direction of the Impala and go to the front door of **8448 54th Avenue South**.
 14 Investigators were able to zoom in to clearly see Beasley's facial features. Investigators
 15 positively identified Beasley from his driver's license photograph.

16 ***April 2018: Surveillance at 13313 Southeast 227th Place***

17 534. On April 3, 2018, investigators saw the **maroon Chevrolet Impala**
 18 **(BHX9836)** parked in the driveway of **13313 Southeast 227th Place**, Kent, Washington.
 19 Investigators also saw a **blue Buick Park Avenue (AWX3675)** registered to Beasley
 20 parked in the driveway.

21 ***May 2018: Surveillance at 13313 Southeast 227th Place***

22 535. On May 7, 2018, investigators saw Beasley arrive in a **gray Chevrolet**
 23 **Tahoe (AVP0293)** and back into the driveway of **13313 Southeast 227 Place**. Beasley
 24 got out of the Tahoe and entered the front door of the residence.

25 ***Most Recently***

26 536. A review of currently available toll data indicates **TT4** used by Wheeler has
 27 been in contact with 206-250-3607 as recently as May 6, 2018. On May 22, 2018,
 28

1 investigators saw the **maroon Chevrolet Impala (BHX9836)** parked in the driveway at
 2 **13313 Southeast 227th Place**. The Impala is registered to this address.

3 **ANTONIO WIGGINS**

4 **Associated Locations: No associated locations sought at this time**

5 **Associated Vehicles: No associated vehicles sought at this time**

6 537. Based upon intercepted calls, I believe Wiggins is a trafficker of unlawfully
 7 diverted pharmaceuticals. Discussed below, Antonio Wiggins was identified using TT53
 8 for which a tracking warrant was authorized. TT53 is subscribed to Wiggins. Wiggins
 9 was seen on surveillance meeting Wheeler after intercepting calls between **TT6** used by
 10 Wheeler and TT53.

11 ***November 2017: Wiggins solicits Cheatham***

12 538. On November 6, 2017, Cheatham using **TT15** received a call from Wiggins
 13 using TT53. Wiggins asked, "When you folks coming back around?" Cheatham asked,
 14 "What?" Wiggins said, "Remember what you called me for and I already had?"
 15 Cheatham said, "Yeah." Wiggins asked, "When your folks coming back around."
 16 Cheatham said, "I have to make a call. See what's up with them." "Give me a couple
 17 hours." Investigators did not intercept a call following up on this conversation.
 18 Investigators do not know whether any follow up conversation occurred in person or on
 19 another telephone. Based upon my training, experience, and knowledge of this
 20 investigation, I suspect that Wiggins was inquiring to see if Cheatham had access to
 21 unlawfully diverted pharmaceuticals.

22 ***February 2018: Wheeler facilitates an oxycodone deal for Wiggins***

23 539. On February 15, 2018, Wheeler using **TT6** called an unknown male
 24 (UM1696) using 206-669-1696 (session 422). During the call UM1696 said he would be
 25 "ready" when he got off work.

26 540. A couple of minutes later, Wheeler using **TT41** called Wiggins using TT53
 27 (session 173). Wheeler said, "My little partner got some" unintelligible word "things for
 28 you if you want them." Wiggins asked, "For what?" Wheeler said, "I think they the

1 apples." Wiggins asked, "What he want for them?" Wheeler sad, "Like twenty one bucks,
2 twenty bucks." Wiggins said, "Yup. Come on." Wheeler said, "I can call this" dude
3 "make sure that ... you said A's and V's huh. Yup?" Wiggins said, "Yup. A's and V's."
4 Wheeler said, "I'll call you right back."

5 541. **TT6** then sent a text message to 206-669-1696 reading, "What is they?"
6 (session 424). **TT6** received the response, "A" (session 426).

7 542. Later **TT41** called **TT53** (session 177). Wheeler said, "Yeah they're the
8 apples." "Twenty two bucks." Wiggins said, "You told me twenty, twenty one." Both
9 started laughing and joking about Wheeler getting caught raising the price. Wiggins
10 agreed to pick Wheeler up to meet **UM1696**. Wiggins said, "I'm about to grab some
11 money, I'm heading that way."

12 543. **TT6** then called 206-669-1696 (session 434). Wheeler asked, "What was
13 the ticket?" **UM1696** said, "Twenty two." Wheeler said, "I told him twenty one, damn."
14 **UM1696** said, "I'll give them to you for twenty one today" "I ain't making no money
15 fucking with your ass." Wheeler said, "I ain't making a dollar either." "You about to
16 hand them straight to him. I was hoping you said twenty so I could make fifty bucks."
17 The two agreed to meet at the Southwest Community Center in West Seattle.

18 544. Based upon my training and experience, I know that oxycodone pills often
19 have the letter "A" or "V" stamped on them. The price of \$20 to \$22 per pill would be
20 consistent with a very good price for 30 mg pills. I believe that Wheeler was attempting
21 to make a one dollar profit per pill by facilitating this deal between the source and
22 Wiggins.

23 545. Later, 702-910-9817 called **TT6** (session 450). Jakari Armstrong
24 (identification described below in a separate section) said he was in the "south end" and
25 decided to get a haircut the following day. Wheeler said he was by "Delridge" (West
26 Seattle) and had to "bust this little play over here" and would meet with Armstrong
27 afterwards.
28

1 546. 702-910-9817 again called **TT6** (session 459). Armstrong asked if Wheeler
 2 was "still in the West." Wheeler said he was at a cheesesteak place in Georgetown.
 3 Armstrong said, "I'm about to pull up on you down there. A few minutes later **TT6**
 4 returned a call (session 460). Wheeler said he was riding with someone and had to go.
 5 Wheeler said their food was "already ready." Wheeler said he would be in "Skyway" at
 6 "Rob's studio" at the "U-Haul" "next door to Ezels."

7 547. Investigators went to the area of Ezell's Famous Chicken in Skyway. Near
 8 this location was a strip mall which included a U-Haul business. Investigators saw
 9 Wheeler, Hunter, and Wiggins (identified from their driver's license photographs) and
 10 others exit the east door to the strip mall attached to the U-Haul business. Hunter got into
 11 the driver's seat of the **silver Honda Odyssey (Florida 7151IA)**. Wheeler got into the
 12 passenger side. Wiggins leaned into the front driver's window. Eventually everyone went
 13 back into the business. Approximately twenty minutes later, investigators observed
 14 Hunter and Wheeler depart in the Odyssey. Wiggins departed in a green Honda Accord
 15 (BGG3865).

16 ***Most Recently***

17 548. A review of currently available toll data indicates **TT6** used by Wheeler has
 18 been in contact with TT53 as recently May 9, 2018.

19 **DENNIS HEROLD**

20 **Associated Locations: No associated locations sought**

21 **Associated Vehicles: Blue Chevrolet HHR (AXP3487)**

22 549. Based upon intercepted calls, I believe Wheeler facilitates obtaining
 23 unlawfully diverted pharmaceuticals for Herold, obtaining these drugs from Beasley and
 24 Wiggins. Discussed below, investigators identified Dennis Herold using TT57 for which
 25 a tracking warrant was authorized while conducting physical surveillance
 26 contemporaneously with intercepted calls.

27 ///

28 ///

February 2018: Wheeler, Herold and Beasley

550. On February 14, 2018, Wheeler using **TT6** received a call from Herold using TT57 (session 318). During the call Herold said, "I can do you thirty five this time." Wheeler asked, "How many?" Herold said, "Six of them." Based upon my training and experience, I believe that Herold was requesting six pills, possibly oxycodone, for \$350.

551. **TT6** then called Beasley using 206-519-0788²⁷ (session 322). Wheeler asked, "You got some joints?" Beasley said, "Yeah." Wheeler asked, "When you coming out?" Beasley said, "In an hour or so." Wheeler said, "I need six of them things." Beasley said, "Alright." **TT6** then called TT57 (session 323). Wheeler said, "He said he is going to be out in an hour. Is that to that too late for you?" Herold said, "Nope."

552. Wheeler using **TT41** called 206-519-0788 (session 116). Beasley informed Wheeler that "Raven's dad died" (significance discussed below). Wheeler also asked Beasley to come to the "Firestarter" on "Two twelfth." Beasley said to come to his house. Wheeler responded, "You want some money or not man." Beasley said, "Yeah of course I do." "The tickets are different though huh? That's the thing too." Wheeler said, "The dude got thirty five dollars." Beasley said, "That's great." Beasley agreed to meet at the Firestarter. Investigators went to the Firestarter Bar and Grill in Kent.

553. Investigators saw a **blue Chevrolet HHR (AXP3487)** registered to Herold arrive and park in the lot of the Firestarter Bar and Grill. **TT6** called TT57 (session 351). Wheeler asked Herold where he was. Herold said he was "straight out from the Firestarter. Probably like, maybe like ten rows back." Wheeler told Herold to "hop out your car."

554. Investigators saw a **maroon Chevrolet Impala (BHX9836)** registered to Raven Dudley ("Raven" was discussed during Wheeler's call with Beasley) pull into the

²⁷ I recognized Beasley's voice from his use of 206-250-3607 discussed in the section regarding Beasley.

1 Firestarter parking lot and park. Wheeler got out of the Impala. Herold²⁸ got out of the
2 HHR and met with Wheeler behind a parked Suburban out of view. Approximately thirty
3 seconds later, Herold got back into the HHR and drove out of the lot. Wheeler got back
4 into the Impala and drove it around to another part of the parking lot. A short time later,
5 investigators saw the Impala and the **blue BMW 535 (AYV1075)** (often driven by
6 Wheeler) depart together.

7 *February 2018: Wheeler, Herold, Hunter and Wiggins*

8 555. On February 19, 2018, **TT6** received a call from TT57 (session 957).
9 Herold said, "I'm going out of town tomorrow, I was hoping that maybe you can help me
10 out one more time." Wheeler said, "What you want." Herold said, "I got like two fifty
11 and an extra twenty for you." Wheeler said he would call when he got back to Seattle and
12 told Herold, "I got you."

13 556. Later that afternoon, **TT6** sent a text message to 206-578-7294, "You got
14 some little blue dudes?" (session 1025), receiving the response, "Tomorrow on way now"
15 (session 1027). Based upon my training and experience, I know that oxycodone pills are
16 often blue. I believe that the user of 206-578-7294 is a source of supply, but did not have
17 access to oxycodone at the time of this communication.

18 557. A little over twenty minutes later, **TT6** received a text message from Herold
19 using TT57 reading, "Any word" (session 1032). Immediately afterwards, **TT41** called
20 Wiggins using TT53. Wheeler said, "A play for you man." Wiggins said, "Huh?"
21 Wheeler said, "I have move for you man." Wiggins said, "What's up." Wheeler said,
22 "Blue" "joints." Wiggins said, "Talk to me." Wheeler said, "I got someone who wants to
23 get a few of them for thirty a pop." Wiggins said, "Fuck it. How many." Wheeler said he
24 would call back.

25
26
27 ²⁸ Investigators identified Herold after viewing a Facebook photograph for a Facebook page associated with him.
28 Investigators later obtained a driver's license photograph and compared it to the Facebook photograph, confirming
they were the same person.

1 558. Immediately after this call, **TT6** sent a text message to Herold using TT57
2 (session 1034) reading "How may you want?" TT57 replied "7" (session 1036).

3 559. Afterwards, **TT41** called TT53 (session 424). The first portion of the call
4 was distorted. After the distorted part of the call, Wiggins said, "Seven huh?" Wheeler
5 said to meet at "Southcenter." Wiggins said, "I'll leave the house right now."

6 560. At approximately the same time, **TT6** replied by text to TT57,
7 "Yep"(session 1038), "Got to meet me at South Center. Call you in a sec" (session 1040).

8 561. Approximately ten minutes later, investigators observed a **gray Lexus ES3**
9 (**BHJ4065**) arrive in front of **8448 54th Avenue South** and park. Wheeler came out of
10 the residence and got into the front passenger seat. Investigators could see that Danavian
11 Hunter, identified from his driver's license photograph, was the driver of the vehicle. The
12 vehicle departed.

13 562. Later, **TT6** received a text message from Herold using TT57 (session
14 1079). The text read: "I'm at buffalo wild wings." Investigators went to the Buffalo Wild
15 Wings is located at the Southcenter Mall in Tukwila.

16 563. Investigators observed the **gray Lexus ES3 (BHJ4065)** arrive at the
17 parking lot of the Southcenter Mall. At the same time, investigators located the **blue**
18 **Chevrolet HHR (AXP3487)** parked in the lot of the Buffalo Wild Wings. The Lexus
19 drove to the Buffalo Wild Wings and parked. The HHR moved over near the Lexus and
20 parked. Wheeler then got out of the front passenger seat of Lexus and went over to the
21 HHR. Wheeler spoke with the driver of the HHR for approximately thirty seconds and
22 then walked inside Buffalo Wild Wings. Wheeler came back outside and talked to the
23 driver of the HHR again. Wheeler then got back into the Lexus and departed.

24 564. A review of surveillance photographs showed Wheeler handing a palm-
25 sized light colored or white object to Herold.

26 ///

27 ///

Most Recently

565. A review of currently available toll data indicates **TT6** used by Wheeler has been in contact with TT57 as recently as May 4, 2018. The **blue Chevrolet HHR (AXP3487)** is currently registered to Herold.

JAKARI ARMSTRONG

Associated Locations: No associated location sought at this time

Associated Vehicles: No associated vehicles sought at this time

566. Based upon intercepted calls, I believe Armstrong is engaged in drug trafficking with Morgan and Wheeler. Discussed below, Jakari Armstrong was identified using 702-910-9817 while conducting video and physical surveillance at one of Wheeler's residence contemporaneous with intercepted calls.

September 2017: Armstrong "needs" Morgan

567. On September 9, 2017, Morgan using **TT1** received a call from Armstrong using 702-910-9817 (session 139). Armstrong asked if Morgan was in the area. Morgan said he was not. Morgan asked Armstrong, "You up moving around?" Armstrong said, "I was walking around today. It hurt though. I went to the hospital to see my homie." "He got hit by one of them expensive bullets." "Right when it made contact, that muthafucka exploded." "His whole calf is gone." "They trying to cut his leg off. But you know, they are trying to give him hope. But his leg looks like it is already starting to rot." "To be honest with you unc, he was the one that save our life. If he didn't start yanknng back" (shooting back) "It was over."

568. According to the Renton Police Department, Armstrong and another subject were the victims of a shooting at a hookah lounge in Renton, Washington on September 4, 2017, where officers located approximately one hundred shell casings in the area and seized an AK-47 pistol from one of the subjects present at the crime scene.

569. Armstrong asked, "You about to be out this way later on?" Morgan said, "I can be. If you need me to." Armstrong said, "Yeah, I need you. My homeboy ..."
Morgan intentionally interrupts, "I already know what's up." Armstrong said, "Yeah."

1 Morgan asked, "What you talking about what you were talking about with me the other
2 day?" Armstrong said, "Yeah."

3 570. During the call, Armstrong said "need" (spoken with emphasis). Based
4 upon my training, experience, and knowledge of this investigation, drug traffickers in this
5 investigation, especially those in Morgan's immediate circles use the word "need" to
6 indicate the need to be supplied with drugs. Discussed throughout this Affidavit, Morgan
7 exhibits discipline with the use of the telephone, often interrupting persons he is speaking
8 to if they start speaking about drug trafficking over the phone.

9 ***February 2018: Drug related calls between Wheeler and Armstrong***

10 571. On February 15, 2018, **TT6** received a call from 702-910-9817 (session 430
11 and 431). During the call, Armstrong said he was coming towards Wheeler's location and
12 needed to get a haircut. Wheeler said to call when Armstrong arrived and Wheeler would
13 "walk over there." Later, 702-910-9817 called **TT6** (session 450). Armstrong said he was
14 in the "south end" and decided to get a haircut the following day. Wheeler said he was by
15 "Delridge" (West Seattle) and had to "bust this little play over here" and would meet with
16 Armstrong afterwards.

17 572. 702-910-9817 again called **TT6** (session 459). Armstrong asked if Wheeler
18 was "still in the West." Wheeler said he was at a cheesesteak place in Georgetown.
19 Armstrong said, "I'm about to pull up on you down there. A few minutes later **TT6**
20 returned a call (session 460). Wheeler said he was riding with someone and had to go.
21 Wheeler said their food was "already ready." Wheeler said he would be in "Skyway" at
22 "Rob's studio" at the "U-Haul" "next door to Ezels."

23 573. Later that evening, **TT6** received a call from 702-910-9817 (session 496).
24 During the call, Armstrong said, "I'm pulling up. I'm passing Othello right now." A little
25 more than ten minutes later, 702-910-9817 called **TT6**. Wheeler asked, "You at the
26 door?" Armstrong said, "No, I'm in the car still."

27 574. At approximately the same time, investigators observed a bronze Chevrolet
28 Tahoe (BHL6835) park in front of **8448 54th Avenue South**. Less than twenty minutes

1 later, the Tahoe departed. Investigators followed the Tahoe to Roman Casino. There,
2 investigators saw Wheeler sitting in the front passenger seat going through a backpack or
3 bag. Wheeler got out of the Tahoe and went into the casino. Investigators could see that
4 the driver was Armstrong (identified from his driver's license photograph).

5 575. On February 27, 2018, **TT6** received a call from 702-910-9817 (session
6 2499). Wheeler immediately said, "Kari come in because neighbors be watching in
7 daytime." Based upon my training and experience, I believe that Wheeler did not want to
8 draw his neighbors' attention out of concern that the neighbors may alert law
9 enforcement if they saw suspicious activity or persons at the residence.

10 576. On February 28, 2017, **TT6** received a call from 702-910-9817. Armstrong
11 asked where Wheeler was. Wheeler said he was by Rainier Beach. Armstrong asked,
12 "You still wanna ... with that quarter?" Wheeler said, "I aint bust no move. I just came
13 from seeing Mikey man. I'm tapped." Armstrong said, "I was just calling before I went
14 towards Kent." Wheeler said, "I probably catch you tomorrow." Based upon my training
15 and experience, I believe that either Wheeler intended on obtaining controlled substances
16 from Armstrong and was out of money, or was supposed to supply Armstrong but was
17 out of drugs. I believe that the reference to "Mikey" is a reference to Morgan.

18 ***March 2018: Drug related calls between Wheeler and Armstrong***

19 577. On March 1, 2018, **TT6** received a call from 702-910-9817 (session 2944).
20 During the call, Armstrong said he was "passing one eighty eighth" (188th Street South
21 and Interstate 5) and was "about to pull up." Approximately half an hour later, 702-910-
22 9817 called **TT6** (session 2953). Armstrong asked, "You trying to pull up to the market
23 unc?" Wheeler said, "Hell no. What market?" Armstrong said, "Right there on the
24 corner." Wheeler said, "You got someone with you or something?" Armstrong said,
25 "Yeah." Wheeler began to respond and Armstrong said, "No it's cool. I'm about to just
26 pull up." "I'll be right there."

27 578. Based upon my training and experience, I believe that Armstrong had a
28 drug customer with him and I know that drug traffickers often try to create separation

1 between their own customers and sources of supply for several reasons. First, to ensure
 2 they are able to profit by being a "middleman." Second, to prevent potential robberies or
 3 burglaries at locations related to sources of supply. And finally, to protect their sources'
 4 identity in case their customer is compromised by law enforcement. Here, I believe
 5 Armstrong attempted to protect Wheeler's stash location by attempting to have Wheeler
 6 come to a nearby store.

7 579. Shortly thereafter, investigators observed via remote video surveillance the
 8 bronze Chevrolet Tahoe (BHL6835) arrive and park in front of **8448 54th Avenue**
 9 **South**. Armstrong (identified from his driver's license photograph) walked up to the front
 10 door and went inside. Armstrong departed in his vehicle approximately ten minutes later.
 11 Based upon my training and experience, Armstrong went to Wheeler's location to obtain
 12 drugs.

13 **CHRISTOPHER CLAY**

14 **Associated Locations: 10507 124th Avenue Northeast**
 15 **Kirkland, Washington**

16 **Associated Vehicles: White Kia Sorento (ATS1433)**
 17 **White Ford F-150 (B88559Y)**

18 580. Based upon intercepted calls, I believe Wheeler supplies Clay with cocaine.
 19 Discussed below, Christopher Clay was identified using 206-948-7904 after conducting
 20 physical surveillance contemporaneously with intercepted calls. Investigators also
 21 stopped Clay in an attempt to seize drugs from Clay. This activity raised the concern of
 22 Morgan.

23 ***February 2018: Owed drug proceeds and cocaine transactions***

24 581. On February 15, 2018, Wheeler using **TT6** received a call from Clay using
 25 206-948-7904 (session 467). During the call, Clay said, "I need to get four of them" (four
 26 ounces of cocaine). "What you going to hit me at?" Wheeler responded, "Nine seventy
 27 five a piece" (\$975 per ounce). Clay asked, "Can I give you" "most of the money to you
 28

1 in the morning when he drops the dough off?" Wheeler said they would do it "first thing
2 in the morning."

3 582. Later that evening, 206-948-7904 called **TT6** (session 508). Clay asked,
4 "Why don't you let me grab one of those right now?" Wheeler said, "I told you I need
5 your money. I'm trying to get some more. I was hoping you had it done now. I could get
6 a whole 'nother book. A couple books." Wheeler said he would call back. Based upon my
7 training and experience, I believe that Clay owes drug proceeds to Wheeler. Wheeler
8 expressed that Clay had the owed proceeds so Wheeler could obtain another kilogram
9 ("book") or two.

10 583. At approximately 8:00 p.m., 206-948-7904 called **TT6** (session 520). Clay
11 asked, "Let me just get a little half or something." Wheeler asked, "Why you can't get the
12 fucking money, man?" Clay said he had to pull money out of his account for rent today.
13 Wheeler said, "I'm trying to get some more shit. You can't get no money?" Clay said, "I
14 got five" (\$500) "on me right now." "I could probably get another five?" Wheeler said,
15 "Meet me at the Bluewater."

16 584. Investigators went to the Bluewater Bistro in the Leschi neighborhood of
17 Seattle. There, investigators saw a **white Kia Sorento (ATS1433)** registered to Lacey
18 and Christopher Clay parked on the street near the restaurant. Investigators identified the
19 driver as Clay from his driver's license photograph. There were other people in the
20 vehicle with him. Clay began to drive away. At the same time, **TT6** called 206-948-7904
21 (session 536). Wheeler said, "I see you right there. Pull over." Investigators saw the Kia
22 immediately park as Wheeler and Hunter exited a red GMC Yukon parked in the lot.

23 585. Hunter walked into the Bluewater Bistro. Wheeler walked to the white Kia
24 and got into the back seat. Within a few minutes, Wheeler got out of the Kia and went
25 into the restaurant. The Kia departed. Based upon my training and experience, I believe
26 Wheeler collected owed drug proceeds from Clay, and Clay may have obtained a half
27 ounce of cocaine.
28

1 586. On the morning of February 16, 2018, 206-948-7904 sent a text message to
2 **TT6** reading, "U up" (session 588). **TT6** responded, "Yeh" (session 591). At
3 approximately 9:41 a.m., 206-948-7904 called **TT6** (session 609). Wheeler said, "Come
4 to the house" "Pull in the back. Come in the gate and then come to the front door and I'll
5 let you in the front door. I don't want nobody car out in front."

6 587. Approximately ten minutes later, investigators observed a black GMC truck
7 arrive in the alley behind **8448 54th Avenue South**. Clay (identified from his driver's
8 license photograph) got out of the truck at the end of the alley and walked to **8448 54**
9 **Avenue South**. The black GMC truck then parked on a side street.

10 588. Less than fifteen minutes later, Clay came from **8448 54th Avenue South**
11 and returned to the black GMC truck. The black GMC truck departed and investigators
12 followed the vehicle to Kirkland where the black GMC truck stopped at an intersection
13 near **10507 124th Avenue Northeast**. Clay got out of the truck and walked to this
14 residence. Based upon my training and experience, I believe that Clay obtained the four
15 ounces of cocaine he requested the previous day.

16 589. On February 20, 2018, 206-948-7903 called **TT6** (session 1369). Wheeler
17 asked, "What you trying to do?" Clay said, "Something small." "Probably just a Vic"
18 (Football quarterback Michael Vick uses the number 7 on his football jersey. Based upon
19 the use of Vic in the context of this call and other calls below, I believe that Clay was
20 referring to 7 grams or a quarter ounce of cocaine, small enough to fit in a person's
21 pocket). Wheeler said, "Call me when you're close."

22 ***March 6, 2018: Clay obtains 7 grams of cocaine and investigators search***

23 590. On March 6, 2018, 206-948-7904 called **TT6** (session 4106). Clay said, "I
24 need a Vic or something" (quarter ounce of cocaine). Wheeler told Clay to meet him near
25 his "Mom's." Clay informed Wheeler, "That one of them was terrible." "One of those, I
26 got all kinds of calls back." "The other one was alright." "That other one people was
27 trippin' on." Clay continued, "I'm just telling you what happened." Based upon my
28

1 training and experience, I believe that Clay was informing Wheeler of the poor quality of
2 previously provided cocaine.

3 591. At approximately 7:10 p.m., 206-948-7904 called **TT6** (session 4116).
4 Wheeler said he would be there in ten to fifteen minutes. Clay said, "There ain't even no
5 bar right here no more man." Wheeler said, "It's called the Firestarter. It is a bar right
6 there." "Go ahead and get a couple drinks. I'll pay for them."

7 592. Investigators went to the Firestarter Bar and Grill in Kent, Washington,
8 locating a **white Ford F-150 (B88559Y)** registered to Christopher and Lacey Clay. 206-
9 948-7904 called **TT6** (session 4130). Wheeler said he was two exits away.
10 Approximately ten minutes later, investigators saw Clay and another subject get into the
11 F-150. 206-948-7904 again called **TT6** (4136). Wheeler said he was "coming up the hill."
12 Clay said he was in the parking lot.

13 593. Approximately ten minutes later, investigators saw the **black Audi Wagon**
14 **(BGJ0165)** registered to Wheeler arrive and park near the F-150. Investigators observed
15 Wheeler get out of the driver's seat of the Audi, get in the F-150, and then get out of the
16 F-150 less than a minute later. The F-150 departed.

17 594. Investigators followed the **white Ford F-150 (B88559Y)** to a Walgreen's
18 parking lot in Kirkland. Clay and the passenger went into Walgreens. When they returned
19 to the F-150, uniformed Seattle Police Gang Unit officers contacted the two while they
20 were sitting inside the F-150. Clay gave consent to officers to search his vehicle. A drug
21 detection canine was present and indicated a positive response to drugs being in the
22 vehicle. Officers did not locate any drugs in the vehicle other than a small amount of
23 marijuana. Clay declined to give officers to consent to search his person.

24 595. The following day, on March 7, 2018, 206-948-7904 called **TT6** (session
25 4230). Clay asked, "Man. Who was that you was meeting last night?" Wheeler asked,
26 "Why what happened?" Clay asked, "Why did the Seattle Police Gang Unit run up on
27 me?" Clay said he went into the Walgreens and came back out and got into the truck and
28 they "rolled out six deep with the task force and everything." Clay said the officer was

1 “trying to get probable cause.” “I end up letting them search my truck” “I had it with me”
2 (emphasis on “me”). Clay said the police were “really reaching.” Clay said that police
3 told him that he had speeding on Highway 167. Clay said, they “rolled deep” “like six
4 cars deep” “they had the dog there.”

5 596. Clay said the Sergeant gave him a case number. Clay stated that he didn’t
6 understand why they gave him a case number, since the officers didn’t take anything.
7 Clay said, “They were really trying to search me, search my person.” Wheeler told Clay
8 to find out what the case number was for. Based upon my training and experience, I
9 believe that Clay believed that the police stop was out of the ordinary and suspected some
10 sort of investigation occurring. I believe that Clay hid the quarter ounce on his person,
11 allowing police to search his car, but not his person.

12 597. Later, **TT6** called 206-948-7904 (session 4235). Wheeler and Clay
13 discussed a crime where Clay and his passenger fit the description of another crime
14 which occurred, during which the suspect stole a white truck. Clay stated, “That makes
15 much more sense.” Wheeler said there was an incident report. Clay said he was going to
16 call the police department.

17 ***Michael Morgan’s concerns with police stop with Clay***

18 598. Later that day, calls between **TT6** and TT47 used by Morgan indicated that
19 Wheeler and Morgan met in person (session 4297 through 4329 involving TT47).

20 599. Afterwards, 206-948-7904 called **TT6** (session 4413). Clay said he called
21 the number on the police business card and stated, “It was the robbery unit.” “What are
22 the odds?” Wheeler said the other crime happened “just inside the city limits.” Clay said,
23 “That shit had me spooked.” “There ain’t no way that Seattle PD was way out here like
24 that.” “They must have been looking on cameras to see who was driving erratically or
25 something.” Wheeler said, “They fit the description.” The two discussed the other crime
26 which, based upon the call, was two teenagers who pushed an old man into a house and
27 shot a woman in the shoulder.
28

1 600. Wheeler said he wanted to see the case number and asked if it was "SPD."
2 Wheeler said the person riding with Clay told someone it was the "DEA." Clay said, "No,
3 that was the dog." "He had a DEA patch on his vest." "He rolled up later. They were
4 waiting for him to run the drug through the truck." About half an hour later, **TT6** sent a
5 text message to TT47 used by Morgan reading, "Hit me." **TT6** did not receive a response.

6 601. The following morning **TT6** called TT47. Wheeler said, "I talked to that
7 fool." Morgan asked, "Did he say what I said was true?" Wheeler said, "Yeah. He said ...
8 it wasn't the D ... it was ... it was, I seen the police rep" Morgan interrupted, "Hey.
9 Hey... ." Wheeler repeated "Yeah" quickly about fifteen times. Wheeler then said, "It
10 was just the dog." Morgan asked, "But why?" Wheeler said he spoke to a bail bondsman
11 who said that Clay was weaving in and out of traffic and construction workers called his
12 car in. Wheeler then said, "Remember, I told you, he fitted that description of that"
13 "armed robbery home invasion." "That's why they did that."

14 602. Morgan asked, "Are you sure, or are you just saying that?" Wheeler said,
15 "Come on man." "I know you don't trust shit." Morgan said, "That part." "I'm not
16 questioning that part." "I'm just be asking 'cause sometimes you don't tell the whole
17 story boy." "You'll leave some shit out sometimes." "I know you." "I've been messing
18 with you for" "like thirty years."

19 603. Based upon this comment, I believe that Morgan and Wheeler have been
20 engaging in drug trafficking together for a matter of decades. I believe that this encounter
21 by law enforcement drew the concern of Morgan because it potentially involved the Drug
22 Enforcement Administration. During this call, Morgan interrupted Wheeler from saying
23 "DEA." I believe Morgan did this out of the concern of potential wiretaps by law
24 enforcement.

25 ***May 2018: Surveillance at 10507 124th Avenue Northeast***

26 604. On the morning of May 8, 2018, investigators saw Clay walk down the
27 stairs from the deck of **10507 124th Avenue Northeast** with a child. The front door exits
28

1 onto the deck of the residence. Clay and the child departed in the **white Kia Sorento**
 2 **(ATS1433)**.

3 605. On May 11, 2018, PSE provided customer information for **10507 124th**
 4 **Avenue Northeast**. According to PSE, the residence has an account for the upper portion
 5 of the residence and the lower portion of the residence. Lacey and Christopher Clay are
 6 listed as the utility customers on service for both.

7 ***Most Recently***

8 606. A review of currently available toll data indicates **TT6** used by Wheeler has
 9 been in contact with 206-948-7904 as recently as May 8, 2018.

10 607. On May 23, 2018, investigators observed the **white Kia Sorento**
 11 **(ATS1433)** and the **white Ford F-150 (B88559Y)** parked at **10507 124th Avenue**
 12 **Northeast**. Investigators saw Clay inside the lower level of the residence closing the
 13 blinds. A few minutes later, a female exited the lower level of the house with Clay. The
 14 female left in the Sorento. Clay went back into the residence. Later, Clay exited the lower
 15 level of the house. Clay got something from the **white Ford F-150 (B88559Y)** and went
 16 back into the lower level of the house.

17 **RAILEN WHEELER**

18 **Associated Locations:** **8448 54th Avenue South, Seattle, Washington**
 19 **20529 61st Place West, Lynnwood, Washington**

20 **Associated Vehicles:** **Black Audi Wagon (BGJ0165)**
 21 **Gray GMC Yukon (BIH2904)**
 22 **Black BMW (AYV1075)²⁹**

23 608. Railen Wheeler using **TT6** and **TT41** was the subject of a wiretap in
 24 February and March 2017. Investigators obtained authorization to intercept both phones
 25 after intercepting them over **TT17** used by Hunter. Wheeler maintains a residence at
 26
 27

28 ²⁹ The Yukon is also discussed in the section regarding Mayers, and the Audi and BMW are also discussed in the
 section regarding Clay. The BMW is also discussed in the section regarding Haywood.

1 **20529 61st Place West**, Lynnwood, Washington and also resides at **8448 54th Avenue**
 2 **South**, Seattle, Washington.

3 ***October 2017: Surveillance at 20529 61st Place West***

4 609. On October 2, 2017, while monitoring video surveillance at **20529 61st**
 5 **Place West**, investigators saw the **white Honda Odyssey (Florida ECIT67)** arrive.
 6 Hunter got out of the Odyssey and walked towards the residence. Hunter departed
 7 approximately forty minutes later. Later, the **black Audi wagon (BGJ0165)** registered to
 8 Wheeler arrived. Wheeler (identification discussed at paragraph 547) got out of the
 9 driver's seat and walked towards the residence with a white plastic bag in his hand.

10 610. Ten minutes later, Hunter returned in the Odyssey. Hunter got out of the
 11 van and walked towards the residence carrying a large multi-colored reusable shopping
 12 bag. More than twenty minutes later, Morgan arrived in his green Honda and walked
 13 towards the residence.

14 611. Ten minutes later, Hunter and Morgan walked towards their respective
 15 vehicles. Hunter was carrying a large box and the multi-colored bag. Hunter opened the
 16 passenger sliding door on the driver's side and spent nearly two minutes leaning into the
 17 van arranging the items. I am aware that this model van has a large compartment in the
 18 floorboard of the van behind the front seats. Based upon what I saw, I believe that Hunter
 19 was placing these items into the compartment.

20 612. While Hunter was doing this, Morgan walked from the direction of the
 21 residence, got into the green Honda and returned to the residence. When Hunter was done
 22 arranging the items, Hunter returned to the residence. Very shortly thereafter, all three
 23 came from the direction of the residence, got into Morgan's **green Honda Civic**
 24 **(BGK1218)**, and departed.

25 ***February 2018: Hunter obtains firearm from 20529 61st Place West***

26 613. On February 15, 2018, Hunter using **TT17** called Wheeler using **TT6**
 27 (session 2050 on **TT17**). Hunter said, "Hey turn it off." After several seconds, Wheeler
 28 replied, "It's turned off now bro." Hunter asked, "Where's this" unintelligible "thing at?"

1 Wheeler said, "Over the stove." Wheeler replied, "Nah the other one." Wheeler said, "In
2 my closet, in the room, where the belts is at." Hunter said, "I like this little thing. Little
3 holster's fat." Wheeler stated, "That mutha fucka works on them sweats and everything."
4 Hunter stated, "It's beautiful." Wheeler said, "Just call me when you pull off and lock the
5 door back up. I can set it from my phone."

6 614. Video surveillance shows that at the approximately time of this call, Hunter
7 arrived in the **silver Honda Odyssey (Florida 7151IA)** and parked in the cul de sac.
8 Hunter walked towards **20529 61st Place West**. Ten minutes later, Hunter walked from
9 the residence towards his vehicle and eventually departed.

10 ***May 2018: Surveillance at 8448 54th Avenue South***

11 615. On May 22, 2018, investigators saw the **black Audi Wagon (BGJ0165)**
12 parked in front of **8448 54th Avenue South**. GPS data indicated **TT41** was also in the
13 vicinity of the residence.

14 ***Most Recently***

15 616. On May 29, 2018, surveillance video footage showed Wheeler come from
16 the fenced yard of **8448 54th Avenue South**, get into the **gray GMC Yukon (BIH2904)**,
17 and depart. Later the same day, surveillance footage showed **gray GMC Yukon**
18 **(BIH2904)** arrive and drive onto the driveway of **20529 61st Place West**. Hunter's **silver**
19 **Honda Odyssey (Florida 7151IA)** was parked in the cul-de-sac.

20 ***Drug Trafficking Activities of Michael Morgan***

21 617. This investigation began as an investigation into Michael Morgan.
22 Investigators developed probable cause to intercept **TT1** after reviewing jail calls that
23 indicated that Morgan was using **TT1** to facilitate drug trafficking. Morgan discontinued
24 use of **TT1** during interception after compromising law enforcement surveillance. In an
25 attempt to reacquire Morgan, investigators found it necessary to intercept phones that had
26 communicated with **TT1** during its interception. These were **TT12** used by Barquet, **TT15**
27 used by Cheatham, **TT17** used by Hunter, **TT18** used by Locke, and **TT19** used by Dao.
28 Eventually, we intercepted Morgan using **TT40** and obtained authorization to wiretap

1 **TT40.** During the most recent period of interception, investigators intercepted Morgan
2 using TT47 over **TT6** used by Wheeler and **TT3** used by Johnny Davis.

3 618. During this investigation, investigators have found Morgan to be a
4 disciplined and careful drug trafficker. Several examples are discussed throughout this
5 Affidavit. Morgan has compromised law enforcement surveillance several times during
6 this investigation. Morgan displayed disciplined use of telephones, providing very little
7 detail when communicating about drug trafficking, cutting people off when he believed
8 others are being too specific, and conveying disapproval in his tone when others spoke
9 specifically about drug trafficking over the phone. Others seemed to acknowledge
10 Morgan's expectation that phone use be disciplined and limited, with calls coded and no
11 explicit references to drug quantities or types, with those details limited to face-to-face
12 meetings. However, many of these co-conspirators including Wilson, Johnny Davis,
13 Wheeler, Charles Cheatham, Dao, and Locke are much less disciplined when they are
14 talking over the intercepted phones with other conspirators. Based upon my training and
15 experience, I believe that Morgan intentionally has this discipline in an attempt to defeat
16 any potential (or in this case actual) wiretap by law enforcement.

17 619. Morgan also shows his discipline in how he conducts his drug transactions.
18 As discussed in this Affidavit, Morgan almost exclusively conducts his transactions and
19 collects drug proceeds from his distributors at their residences. Based upon my training
20 and experience, this is atypical. As discussed throughout this Affidavit, most of the drug
21 transactions conducted by other distributors in this investigation occurred in public
22 places. I believe Morgan conducts his transactions at the residences of his distributors as
23 an intentional effort to minimize exposure to law enforcement.

24 620. Also discussed below, Morgan does not always make himself available to
25 his distributors. For example, sometimes Morgan does not answer calls, and may not call
26 back for days. Because of this, several of his distributors, such as Larry Holloway, Ernie
27 Davis, Johnny Davis, Joseph Wilson, and Edward Locke reach out to each other, Charles
28 Cheatham, or other drug distributors to be supplied.

1 **PATRICK WILLIAMS**

2 **Associated Locations: 9604 South 200th Street**
 3 **Kent, Washington**

4 **Associated Vehicles: Silver Honda Accord (BGH9778)**
 5 **Black Honda Pilot (BJK4798)**

6 621. Based upon intercepted calls, I believe Morgan and Wheeler supply
 7 Williams with cocaine. Discussed below, Patrick Williams was identified using TT56 for
 8 which a tracking warrant was authorized. GPS data indicated that TT56 was often in the
 9 vicinity of **9604 South 200th Street**, Kent, Washington during overnight hours.
 10 Investigators identified Williams as holding TT56 after GPS data allowed investigators to
 11 track Williams from his workplace to his home.

12 ***February 2018: Wheeler provides kilogram of cocaine to Williams***

13 622. On February 16, 2016, Wheeler using **TT6** received a call from Morgan
 14 using TT47 (session 625). The two spoke socially for a while. Towards the end of the call
 15 Morgan said, "Remember what I told you about like about Pat?" Wheeler said, "Yeah."
 16 Morgan said, "I'm going to need you to put in the play bro." Wheeler responded in a
 17 mockingly upset tone, "I mean damn. Quit talking to me, man. I don't even want to talk
 18 to you no more on the phone. Just, I'll be over here. Just come talk to me. I'll see you
 19 when you get over here." Morgan after a pause responded, "Oooh." Wheeler said, "Oooh.
 20 Served you." Both started laughing.

21 623. Based upon previous intercepted calls involving Morgan, I know Morgan
 22 exercises caution when speaking on the phone, often interrupting another party when the
 23 conversation turns to drug trafficking. Based upon the tone Wheeler was using and the
 24 laughter afterwards, I believe Wheeler was mocking Morgan regarding his cautiousness.
 25 When Morgan said he needed Wheeler to do the "play," he was requesting that Wheeler
 26 provide drugs spoken about in person with Wheeler to Williams.

27 624. On February 17, 2018, Wheeler using **TT41** received a call (session 304)
 28 from Williams using TT56. Williams said, "I need you, link in for me man." Wheeler

1 asked, "How many?" Williams responded, "Just one for right now." Wheeler said, "You
 2 come get it. I got one right now. I'm going to text you the address. I am at my girl's
 3 house." Williams asked, "What's the lick on it?" Wheeler said, "I paid twenty seven. Just
 4 give me two hundred fifty bucks. I'll go back and get some more." Based upon my
 5 training and experience, I believe that Williams requested one kilogram of cocaine and
 6 Wheeler quoted the price of \$27,000 and requested an additional \$250 dollars for
 7 Wheeler's profit.

8 625. A little more than half an hour later, **TT41** received a call from TT56
 9 (session 306). Williams called to get directions as to where to park. Wheeler said, "That's
 10 you right there, slow down." "Go around Pat. Keep going straight, and then make the
 11 sharp left, and then first alley way." "Pull right by my truck."

12 626. Less than ten minutes later, **TT6** sent a text message (session 741) to TT47
 13 reading "Bro came." Later, TT47 called **TT6** (session 744). Wheeler said, "That" dude
 14 "did exactly what you said." Both laughed and Morgan said he knew that dude "like a
 15 book." Wheeler said, "He be looking for that eye contact like how you be looking for."
 16 Morgan asked Wheeler, "You blew it?" Wheeler said he did not. The two bantered on
 17 whether Wheeler blew the deal. Wheeler said, "He said, 'I be back.' I said bro, just give
 18 me two-fifty man. You know, he was cool with it." Based upon my training and
 19 experience, I believe Morgan orchestrated this kilogram cocaine deal between Wheeler
 20 and Williams.

21 ***March 2018: Surveillance of TT56***

22 627. On the morning of March 20, 2018, investigators attempting to locate
 23 Williams scoured the vicinity of Virginia Street and Terry Avenue in Seattle. GPS data
 24 indicated TT56 was in the vicinity. There, investigators located a **silver Honda Accord**
 25 (**BGH9778**) registered to Williams at an address in south Seattle parked on the street.

26 628. Later that day, investigators went to **9604 South 200th Street**. GPS data
 27 indicated that TT56 was often in the vicinity. Investigators saw the Accord arrive being
 28

1 driven by Williams (identified by his driver's license photograph). GPS data indicated
2 TT56 also arrived in the vicinity.

3 629. The following day, March 21, 2018, GPS data indicated that TT56 was in
4 the vicinity of Lenora Street and Terry Avenue in Seattle. Investigators located the **silver**
5 **Honda Accord (BFH9778)** parked on the street. Investigators later saw Williams return
6 to the vehicle and depart. GPS data for TT56 indicated that the phone departed
7 approximately at the same time.

8 ***May 2018: Surveillance at 9604 South 200th Street***

9 630. On May 10, 2018, investigators saw Williams arrive at **9604 South 200th**
10 **Street** in the **silver Honda Accord (BGH9778)** and park in the driveway. Williams got
11 out and walked towards the house. On May 15, 2018, investigators saw a **black Honda**
12 **Pilot (BJK4798)** registered to Williams parked in the driveway.

13 ***Most Recently***

14 631. A review of currently available toll data indicates **TT41** used by Wheeler
15 has been in contact with TT56 as recently as April 14, 2018. On May 8, 2018, PSE
16 identified Jessica and Patrick Williams as utility customers for **9604 South 200th Street**.

17 632. On May 23, 2018, investigators observed the **silver Honda Accord**
18 **(BGH9778)** parked in the driveway of **9604 South 200th Street**.

19 **JOHNNY DAVIS**

20 **Associated Locations: 22247 35th Place South, Apartment D104**
21 **Kent, Washington**

22 **Associated Vehicles: Gray Chevrolet Silverado (C41908L)**

23 633. Discussed below, Johnny Davis was identified using **TT3** for which
24 tracking warrants were authorized. Investigators also obtained authorization to intercept
25 **TT3** after intercepting **TT3** over **TT1** used by Morgan, **TT8** used by Locke, and **TT12**
26 uses by Barquet.

27 ///

28 ///

January 2018: Surveillance of TT3

634. In the late evening hours of January 16, 2018, **TT3** used by Johnny Davis indicated that the phone was in the vicinity of the Skyview Apartment complex in Kent. There investigators located a **gray Chevrolet Silverado (C41908L)** parked near **22247 35th Place South (Building D)**.

February 13, 2018: Johnny Davis distributes cocaine

635. On February 13, 2018, **TT3** received a call from an unknown male (UM8470) using 253-517-8470 (session 77). UM8470 said, "Trying to get a beezy of dark man" (half unit of heroin) "and a half beezy of hard man" (half unit of crack cocaine) "and a g of soft" (gram of powder cocaine). Johnny Davis said, "Alright." Based upon my training and experience, I believe that Johnny Davis agreed to provide UM8470 with heroin, crack cocaine, and powder cocaine.

February 21, 2018: Morgan collects drug proceeds from Johnny Davis

636. On February 21, 2018, Davis using **TT3** received a call from Morgan using TT47 (session 942). Morgan asked, "Where you at?" Davis responded, "At the crib" (home). Morgan replied, "Alright, I'll see you over there." Less than fifteen minutes later, **TT3** called TT47 (session 951). Morgan answered, "I'm pulling in right now."

637. Immediately after this call, investigators saw the **green Honda Civic (BGK1218)** pull into the parking lot near **22247 35th Place South (Building D)** and park. Investigators observed Morgan (identified from his driver's license photograph) get out of the Civic and go into **Apartment D104**. Approximately three minutes later, Morgan came out of the apartment, got into the Civic, and departed.

638. Less than ten minutes later, investigators observed Johnny Davis (identified from his driver's license photograph) come out of the apartment and get into the **gray Chevrolet Silverado (C41908L)** and depart.

639. Later that evening, **TT3** received a call from Edward Locke using **TT18** (session 1010). During their conversation, Locke said, "Hey, if you talk to dog, tell him to call me." Johnny Davis said, "Say what?" Locke said, "If you talk to Dose" (Morgan)

1 “tell him to call me man. That tramp ain’t answering the phone.” Johnny Davis said, “He
 2 just left here today.” “I told him I was going to give him five racks” (\$5,000) “but I only
 3 had three.” He “got mad and left the three” (\$3,000). “He needs his paper. I’m just trying
 4 to give it to him as fast as I can.” “But shit ain’t happening like how I want it to. So you
 5 know, he’s mad right now.” “I gotta stay down and keep getting’ my money right till I
 6 pay” him “off.” “When I could be back in his motha fucka good graces again.” “I can’t
 7 burn the only bridge that I’m fucking crossing.”

8 640. Based upon my training and experience, Morgan went to Johnny Davis’s
 9 residence to collect owed drug proceeds. When Davis did not have the amount of money
 10 Morgan expected, he left without taking any money. Based upon this call, Morgan is a
 11 main source of supply for Johnny Davis.

12 ***March 2018: Johnny Davis distributes cocaine***

13 641. On March 6, 2018, **TT3** received a call from Misty Hurt using 253-886-
 14 8661.³⁰ Hurt told Johnny Davis, “Robbin wants a teener of hard. Do you have any?”
 15 (crack cocaine). Johnny Davis said “Yeah.” Hurt said, “You can just get the money,
 16 babe.” Johnny Davis said, “It’s in my coat, uh, pocket” “sitting on the chair.” Based upon
 17 my training and experience, Hurt facilitated a crack cocaine deal for Johnny Davis and
 18 Davis directed Hurt to his jacket inside **22247 35th Place South, Apartment D104**.

19 ***March 14, 2018: Ernie Davis supplies Johnny Davis with cocaine***

20 642. On March 14, 2018, **TT3** called 206-605-8100 used by Ernie Davis (session
 21 4330). During the call, Johnny Davis said, “I need to get on real quick.” Ernie Davis
 22 asked, “How many?” Johnny Davis said, “Two piece” (2 ounces of cocaine). Later, 206-
 23 605-8100 called **TT3** (session 4364). Johnny asked where to meet Ernie Davis. Ernie
 24 Davis said, “Up in Skyway at the house.”
 25
 26
 27

28 ³⁰ According to Puget Sound Energy (PSE), Misty Hurt is the utility customer at **22247 35th Place South, Apartment D104**, Kent, Washington. Hurt listed 253-886-8661 as her phone number with PSE.

643. Approximately five minutes later, investigators observed Johnny Davis (identified from his driver's license photograph) come out of **22247 35th Place South, Apartment D104**. Davis then got into the **gray Chevrolet Silverado (C41908L)** and departed.

644. Twenty minutes later, investigators observed the Silverado pull into the driveway of **12807 Renton Avenue South** in Seattle. Investigators observed a male come from the residence and walk to the passenger side door, open it, and lean inside. The male then walked away from the truck and the Silverado departed. Based upon my training and experience, investigators observed Ernie Davis supply Johnny Davis with two ounces of cocaine.

May 2018: Surveillance at 22247 35th Place South, Apartment D104

645. On May 5, 2018, investigators saw Davis looking out of the front door of **22247 35th Place South, Apartment D104**. Investigators saw the **gray Chevrolet Silverado (C41908L)** parked near the apartment.

Most Recently

646. A review of currently available toll data indicates TT47 used by Morgan has been in contact with **TT3** as late as May 9, 2018. On May 11, 2018 PSE identified Johnny Davis as a utility customer at **22247 35th Place South, Apartment D104**.

647. On May 22, 2018 investigators saw the **gray Chevrolet Silverado (C41908L)** parked almost directly in front of **22247 35th Place South, Apartment D104**.

ERNIE DAVIS

Associated Locations: 12807 Renton Avenue South, Seattle, Washington

Associated Vehicles: Black Toyota Camry (BHY9139)

648. Discussed below, Ernie Davis was identified using TT2 for which a tracking warrant was authorized. Investigators also intercepted Davis using 206-387-8820. GPS data indicated that TT2 was often in the vicinity of **12807 Renton Avenue South, Seattle, Washington** during overnight hours. Investigators identified Davis using

1 TT2 by conducting physical surveillance in conjunction with GPS data for TT2.³¹

2 Investigators also identified Davis as using both of the above described phones by
3 conducting physical surveillance contemporaneously with intercepted calls.

4 ***February 2018: Ernie Davis attempts to call Morgan, and then calls Cheatham***

5 649. On February 27, 2018, Ernie Davis using 206-387-8820 made two
6 unanswered phone calls to **TT40** (Morgan). One call was made at approximately 2:31
7 p.m. (session 643) and another at 7:09 p.m. (sessions 653). Based upon my training and
8 experience, and knowledge of this investigation, I believe that Ernie Davis attempted to
9 contact Morgan for the purpose of obtaining cocaine. When Morgan did not return the
10 call, Ernie Davis called Cheatham.

11 650. At approximately 8:20 p.m., 206-387-8820 called Cheatham on **TT46**
12 (session 1160). Cheatham asked, "What you talkin' about?" Ernie Davis said, "Like a
13 little nino" (9 ounces of cocaine) "or something." Cheatham said, "Where you gonna
14 bump at?" Davis said, "I just got to run over here to Othello real quick."

15 651. Approximately fifteen minutes later, **TT46** called 206-387-8820 (session
16 1161). Cheatham told Davis to meet him at the Chevron off "Marginal" near the freeway.
17 Investigators went to the Chevron gas station located near the Boeing Access Road and
18 Interstate 5. There, investigators saw Cheatham walk from a white Nissan Murano parked
19 at the gas pumps and into the store. The white Murano had a temporary paper tag and did
20 not have license plates. Cheatham later returned to the vehicle.

21 652. A few minutes later, investigators saw a **black Toyota Camry (BHY9139)**
22 park in the Chevron parking lot. Cheatham walked over to the Camry and got into the
23 passenger seat. Approximately one minute later, Cheatham got out of the Camry and
24 walked back towards the white Murano. The Camry departed. Investigators pulled up
25

26
27 ³¹ When tracking TT2, on November 8, 2016, GPS data indicated TT2 was in the vicinity of **12807 Renton Avenue**
28 **South**. Investigators saw a Lexus depart the residence. GPS data indicated TT2 also departed. Investigators followed
the Lexus to an address in Renton. There, they saw that Davis was the only occupant of the Lexus. GPS data
indicated TT2 was also in the vicinity of the Renton address.

1 next to the Camry and looked into the vehicle. Investigators identified the driver as Ernie
2 Davis from his driver's license photograph.

3 ***March 2018: Ernie Davis does transaction with Cheatham***

4 653. On March 2, 2018, **TT46** called 206-387-8820 (session 1349). Ernie Davis
5 told Cheatham to come to "Skyway." Cheatham said to give him about an hour.
6 Investigators went to **12807 Renton Avenue South** in the Skyway neighborhood of
7 Seattle and saw the **black Toyota Camry (BHY9139)** parked in the driveway.

8 654. Almost two hours later, **TT46** called 206-387-8820 (session 1363). Ernie
9 Davis said he was at the mall. Cheatham asked, "Southcenter?" Ernie Davis affirmed.
10 Cheatham said he would meet Ernie Davis at "Bahama Breeze."

11 655. Investigators went to the Bahama Breeze restaurant located at the
12 Southcenter Mall in Tukwila, Washington. There, investigators saw the **black Toyota**
13 **Camry (BHY9139)** parked. Davis was in the driver's seat. **TT46** then called 206-387-
14 8820 (session 1365). Cheatham asked "Where you at dude?" Ernie Davis said he was
15 backed in by the front door. Cheatham then said he saw Ernie Davis.

16 656. Investigators saw Cheatham's **black Cadillac Escalade (BHY8148)** drive
17 into the parking lot and stop near a **black Toyota Camry (BHY9139)**. Ernie Davis,
18 identified from his driver's license photograph, got out of the Camry and got into the
19 back seat of the Escalade. Less than a minute later, Ernie Davis got out of the Escalade
20 and returned to the Camry. Both departed. Based upon my training and experience, I
21 believe investigators witnessed a drug transaction.

22 ***March 2018: Ernie Davis supplies Johnny Davis with 2 ounces of cocaine***

23 657. On March 5, 2018, Johnny Davis using **TT3** received a call from Ernie
24 Davis using **TT2** (session 2601). During the call, Johnny Davis and Ernie Davis talked
25 about Ernie Davis's marijuana trafficking. At the end of the conversation, Johnny Davis
26 changed his tone and said, "I need the two piece from you man." Based upon my training
27 and experience, and knowledge of this investigation, I believe that Johnny Davis was
28 requesting two ounces of cocaine. Ernie Davis said, "I'm in Skyway." Johnny Davis

1 asked, "Are you ready?" Ernie Davis said, "Come to the house in Skyway." Johnny
2 Davis said he would be right there.

3 658. Investigators went to **12807 Renton Avenue South**. Approximately half an
4 hour after the above call, investigators saw the **gray Chevrolet Silverado (C41908L)**
5 pull into the driveway. Investigators saw the driver, a male who matched the physical
6 description of Johnny Davis get out of the truck. The driver returned to the vehicle
7 approximately one minute later, followed by several other subjects who spoke to the
8 driver through the window. GPS data for **TT3** also indicated that the phone was in the
9 vicinity. Approximately ten minutes later, the Silverado departed.

10 ***May 2018: Surveillance at 12807 Renton Avenue South***

11 659. On May 7, 2018, investigators saw the **black Toyota Camry (BHY9139)**
12 parked in front of **12807 Renton Avenue South**. Investigators saw Ernie Davis walk
13 from the front of the house to the SUV. Davis then walked towards the Toyota Camry.
14 Davis then walked back to the SUV. A short time later, Davis walked around the west
15 side of the house.

16 ***Most Recently***

17 660. A review of currently available toll data indicates TT47 used by Morgan
18 has been in contact with 206-387-8820 as recently as May 8, 2018 and with TT70 used
19 by Cheatham as recently as May 9, 2018. Ernie Davis lists **12807 Renton Avenue South**
20 on his driver's license.

21 661. On May 22, 2018, investigators saw the **black Toyota Camry (BHY9139)**
22 arrive at **12807 Renton Avenue South**. A few minutes later, investigators watched it
23 depart, and were able to see Ernie Davis was driving.

24 ///

25 ///

1 **LARRY HOLLOWAY**

2 **Associated Locations: 1675 Index Avenue Southeast**
 3 **Renton, Washington**

4 **Associated Vehicles: No associated vehicle sought**

5 662. Discussed below, investigators believe Larry Holloway uses 206-578-6437.
 6 CS2 had previously informed investigators that Morgan supplies Holloway with cocaine.
 7 Based upon intercepted calls, Holloway is engaged in drug trafficking with Johnny Davis,
 8 and Charles Cheatham supplies Holloway with cocaine.

9 ***February 2018: Johnny Davis obtains cocaine from Holloway***

10 663. On February 20, 2018, Johnny Davis using **TT3** called Holloway using
 11 206-578-6437 (session 852). Johnny Davis asked, "I was just wondering man, do you
 12 have a two piece? Of the, snow." Holloway said, "I do." "What's going to make it fair for
 13 both of us?" Johnny Davis said, "Like nine a pop or something?" Holloway said, "That's
 14 cool." Johnny Davis said, "Give me an hour, I'll be through there."

15 664. Approximately half an hour later, **TT3** called 206-578-6437 (session 866).
 16 Johnny Davis asked, "I was just making sure you were home." Holloway said, "Yup."
 17 Johnny Davis said he would pull up in five minutes. Two minutes later, 206-578-6437
 18 called **TT3** back. Holloway said he needed to "run down to seventy six" "right there by
 19 the circle store." Holloway told Johnny Davis to meet him there.

20 665. Less than ten minutes later, investigators observed the **gray Chevrolet**
 21 **Silverado (C41908L)** arrive at a 76 gas station on South Puget Drive in Renton and park
 22 at the gas pumps. A few minutes later, a blue Dodge Caravan (BEL7842) rental vehicle
 23 arrived at the 76 gas station. Johnny Davis got out of the Silverado and into the front
 24 passenger seat of the Caravan. After a very short period of time, Johnny Davis got out of
 25 the Caravan, returned to his vehicle and started pumping gas. The Caravan departed.

26 666. Less than ten minutes later, investigators saw the blue Dodge Caravan
 27 arrive at **1675 Index Avenue Southeast**, Renton, Washington. According to Enterprise,
 28

1 the Dodge Caravan was rented to Larry Holloway. On the rental agreement, Holloway
2 listed his address as **1675 Index Avenue Southeast**.

3 ***March 2018: Holloway orders a "baby" (4½ ounces of cocaine)***

4 667. On March 2, 2018, 206-578-6437 called Cheatham using **TT46** (session
5 1360). Holloway told Cheatham he was "getting ready to take the baby for a walk."
6 Cheatham said, "Yup, yup, yup. I'm about to leave the house right now." Cheatham said
7 he would be there in about an hour or less. Based upon my training and experience, I
8 believe the reference to the "baby" was a reference to four and a half ounces of cocaine.
9 Based upon the response by Cheatham, I believe that he understood this as well.

10 668. Later, **TT46** called 206-578-6437. Cheatham told Holloway, "I'm about to
11 ride down there." Approximately ten minutes later, investigators arrived at **1675 Index**
12 **Avenue Southeast** and saw the **black Cadillac Escalade (BHY8148)** parked in front of
13 the residence. Investigators then saw Cheatham come out of the residence, get into the
14 Escalade and depart. Investigators also observed a male get into a white Dodge Caravan
15 (BEL6205) rental vehicle and depart. According to Enterprise this vehicle was rented to
16 Larry Holloway listing his address as **1675 Index Avenue Southeast**.

17 ***May 2018: Surveillance at 1675 Index Avenue Southeast***

18 669. On May 10, 2018, investigators saw Holloway, identified from his
19 Washington driver's license photograph, come out of the front door of **1675 Index**
20 **Avenue Southeast**. Holloway went to a gray Dodge Caravan rental vehicle (BJW9137).
21 According to Enterprise, this vehicle was rented by Larry Holloway. Holloway went back
22 into the house.

23 ***Most Recently***

24 670. During interception of **TT3**, I recognized the voice of the user of 206-549-
25 1014 as belonging to Holloway. A review of currently available toll data indicates this
26 phone number has been in contact with **TT47** as recently as April 28, 2018, and with
27 **TT70** as recently as May 9, 2018.
28

671. On May 11, 2018, PSE identified Larry Holloway as a utility customer for **1675 Index Avenue Southeast**. Holloway lists this address on his driver's license.

672. On May 22, 2018, investigators saw the same gray Dodge Caravan rental vehicle (BJW9137) discussed above, seen on May 10, 2018, parked in front of **1675 Index Avenue Southeast**.

JIHAD ZEIGLER

**Associated Locations: 2420 Southwest 319th Place
Federal Way, Washington**

Associated Vehicles: Black Mercedes Coupe (BBY1137)

673. Discussed below, Jihad Zeigler was identified using TT8 for which a tracking warrant was authorized.³² TT8 is subscribed to Zeigler. GPS data, while not precise, indicated TT8 was often in the vicinity of **2420 Southwest 319th Place**, Federal Way, Washington during overnight hours. Zeigler is currently on federal supervision for drug charges and there is an active warrant for his arrest for probation violation.

May and June 2017: Surveillance of TT8

674. On May 16, 2017, GPS data indicated that TT8 was in the Federal Way area and was not precise enough to locate TT8. Investigators examined subpoenaed toll data for TT8 and found a frequent caller used **2420 Southwest 319th Place**, Federal Way, Washington on her driver's license. Investigators went to this location.

675. There, investigators located a **black Mercedes Coupe (BBY1137)**. According to the Washington State Patrol, they arrested Zeigler for DUI while driving this vehicle in January of 2018. Troopers also located a "ping pong ball" sized quantity of suspected heroin in the vehicle. I know based upon my training and experience, that this was likely an ounce of heroin.

³² While tracking TT8, on June 9, 2017, GPS data indicated that TT8 was in the vicinity of **2420 Southwest 319th Place**. There, investigators saw Zeigler, identifying him from his driver's license photograph, get into the **black Mercedes Coupe (BBY1137)** and depart. GPS data indicated that TT8 departed the vicinity as well.

1 676. On June 9, 2017, investigators saw Zeigler exit **2420 Southwest 319th**
2 **Place** and leave in the **black Mercedes Coupe (BBY1137)**. Investigators followed
3 Ziegler out of the area and determined that TT8 was traveling with Zeigler.

4 ***February 24, 2018: Interception of TT8 with Cheatham***

5 677. On February 24, 2018, Cheatham using **TT46** received a call from Martin
6 Banks using 206-380-5454 (session 184). Banks told Cheatham that "Jihad" is on
7 television and has good seats. Banks was referring to a basketball game on television.
8 Cheatham said, "I see him right now!" Cheatham said he was going to call Jihad.
9 Afterwards, **TT46** called Zeigler using TT8 (session 190). Cheatham told Zeigler that he
10 saw him on television, live, on the broadcast of the Portland Trailblazers game in Los
11 Angeles. Cheatham referred to Zeigler as "Haji."

12 678. On March 6, 2018, **TT46** received a call from Larry Holloway using 206-
13 578-6437 (session 1779). Holloway said they were on the way to "Haji's to get it going.
14 Just to letting you know." "We on the way out there now." Holloway said he would have
15 Zeigler text Cheatham the address.

16 679. Later, TT8 called **TT46** (session 1789). Zeigler provided his address,
17 "Twenty four twenty southwest three nineteenth place" (**2420 Southwest 319th Place**)
18 and provided direction from 320th. Zeigler also stated, "We at the forty eighty right
19 now." Cheatham said, "It's high stakes." Zeigler said, "It's high stake early." Based upon
20 my training and experience, I believe that Cheatham and others were going to Zeigler's
21 residence to gamble.

22 680. Investigators went to **2420 Southwest 319th Place**. GPS data indicated
23 **TT46** was in the vicinity. There, investigators saw Cheatham's **black Cadillac Escalade**
24 **(BHY8148)**, Ernie Davis's **black Toyota Camry (BHY9139)**, and Holloway's rental
25 white Dodge Caravan (BEL6205) parked in front of the residence. Investigators also saw
26 the **black Mercedes Coupe (BBY1137)** parked in front of the residence.

27 ///

28 ///

May 2018: Surveillance at 2420 Southwest 319th Place

681. On May 7, 2018, investigators saw the **black Mercedes Coupe (BBY1137)** parked in the driveway of **2420 Southwest 319th Place**. Investigators saw the garage door open. Inside the garage was a black Mercedes Coupe (BKJ6007). Investigators saw Zeigler inside the garage.

682. On May 22, 2018, investigators saw the gray Dodge Caravan rental vehicle (BJW9137) rented by Larry Holloway³³ and a black Chevrolet Tahoe (BJX8129)³⁴ parked in front of **2420 Southwest 319th Place**.

Most Recently

683. A review of currently available toll data indicates TT70 used by Cheatham has been in contact with TT8 as recently as May 9, 2018.

684. On May 23, 2018, investigators saw Zeigler washing an older collector-style vehicle in the driveway of **2420 Southwest 319th Place**.

EDWARD LOCKE

**Associated Locations: 8510 10th Avenue West, Apartment B213
Everett, Washington**

Associated Vehicles: Black Dodge Durango (British Columbia FN508A)

685. Discussed below, Edward Locke was identified using **TT18** for which wire and electronic interception and tracking warrants were authorized. The interception of **TT18** was authorized after intercepting Locke using **TT18** speaking to Morgan using **TT1**. Interception indicated that Locke owed Morgan drug proceeds. Interception of **TT18** indicated Locke was a distributor of cocaine, heroin, and unlawfully diverted pharmaceuticals

September 12, 2017: Morgan and Locke discussed owed drug proceeds

686. On September 12, 2017, Michael Morgan using **TT1** called **TT18** (session 473). Morgan greeted Locke and had some small talk. After about thirty seconds of

³³ This vehicle was seen on May 10, 2018, parked in front of **1675 Index Avenue Southeast**.

³⁴ This vehicle lists Ernie Davis's residence, **12807 Renton Avenue South**, on its registration.

1 conversation Morgan asked, "What's going on man?" Locke said he wanted "to get at"
2 Morgan but Morgan's phone "going straight to voicemail for a while." Morgan said he
3 probably had the phone off. Locke said that he "finally got over the little hump" and so
4 now he was "pushing" (had trouble selling drugs in his possession and was now selling
5 the drugs). Locke told Morgan he "wanted to get it together" and "straighten you"
6 (Morgan) "out." Morgan asked, "When you trying to do that?" Locke said, "I can do like
7 shoot you two two two two, or I can just wait and ... five ... five. Or however you want
8 to do." Morgan responded, "Whatever works for you brother." Both started laughing and
9 Locke responded, "No pressure ok? That's what I'm talking about baby." Locke said,
10 "Monday or something." Morgan abruptly changed the subject and the two continued to
11 have small talk for another ten minutes.

12 687. Based upon my training and experience, I believe Morgan called Locke to
13 collect drug proceeds. I believe that Locke indicated that he was attempting to gather the
14 owed proceeds, and could pay Morgan in small installments as soon as Monday.

15 *September 2017: Surveillance of TT18*

16 688. On September 21, 2017, GPS data indicated **TT18** was in the vicinity of
17 Uncle Thurms Finger Lickin Ribs and Chicken in Tacoma. At that location, investigators
18 located a **black Dodge Durango (British Columbia FN508A)** in the lot. Investigators
19 saw Edward Locke (identified by his driver's license photograph) get out of the Durango
20 and move boxes between the business and the Durango. Locke then departed in the
21 Durango. GPS data showed that **TT18** traveled to the Tacoma Mall. There investigators
22 located the Durango. Investigators saw Locke come out of the mall and return to the
23 Durango.

24 689. Later GPS data indicated that **TT18** was in the vicinity of Freddie's Casino
25 in Renton. There, investigators again located the Durango. Investigators observed
26 Edward Locke and Deon Locke (identified from his driver's license photograph) come
27 from the casino and walk to the Durango. Edward Locke got into the driver's seat and
28

1 Deon Locke got into the passenger seat. They departed in the Durango. GPS data for
2 **TT18** indicated that the phone departed the area as well.

3 690. Later that evening, GPS data for **TT18** indicated that the phone was in the
4 vicinity of 3508 Norton Avenue, Everett, Washington. Investigators went to that location
5 and located the Durango parked in the driveway.

6 691. On September 25, 2017, GPS data indicated that **TT18** was in the vicinity
7 of the Norton Avenue residence. There investigators located the Durango. The Durango
8 departed the residence and investigators followed it to the Northgate Mall in Seattle. The
9 Durango parked at the north end of the mall. Edward Locke got out of the driver's seat
10 and walked into the Bed Bath and Beyond. There were no other occupants in the
11 Durango. GPS data also showed that **TT18** was at the mall.

12 ***November 2017: Cocaine distribution by Locke***

13 692. On November 6, 2017, **TT18** received a call from an unknown male
14 (UM4906) using 425-330-4906 (session 562). UM4906 asked, "You still got powder?"
15 (cocaine). Locke said, "Yeah." UM4906 asked, "Can you come by Great American?" "I
16 just was like fifty" (\$50 worth) "Are you going to give me a good deal?" Locke said,
17 "Yeah." "Give me about forty five minutes because I'm eating."

18 693. A little over an hour later, **TT18** sent a text message to 425-330-4906
19 (session 595) reading, "I'm getting off the exit". Several minutes later, **TT18** received a
20 reply, "I'm outside great American" (session 596). Investigators arrived at the Great
21 American Casino in Everett and saw Locke and another person standing outside the
22 **black Dodge Durango (British Columbia FN508A)**. Shortly thereafter, the person
23 Locke met with walked away, and Locke left in the Durango. Based upon these
24 observations, I believe that Locke conducted a cocaine transaction with this subject.

25 ***November 2017: Locke at 8510 10th Avenue West, Everett, Washington***

26 694. On November 12, 2017, Locke using **TT18** called an unknown female
27 (UF6524) using 604-817-6524. Locke asked, "Hey babe, what's my apartment number?"
28

1 UF6524 said, "**B213.**" Locke asked, "What's the address?" UF6524 said, "**8510 10th**
2 **Avenue West.**"

3 695. On November 28, 2017, investigators located the **black Dodge Durango**
4 **(British Columbia FN508A)** parked in front of **building B** of the Nova North
5 Apartments at **8510 10th Avenue West**, in Everett. Investigators saw Locke come out of
6 Building B and get into the Durango. The Durango departed. More than two hours later,
7 the Durango returned.

8 ***February 2018: Locke intercepted speaking to Johnny Davis***

9 696. Discussed in the section regarding Johnny Davis, Locke was also
10 intercepted in late February 2018 on **TT3** using **TT18**.

11 ***May 2018: Surveillance at 8510 10th Avenue West Apartment B213***

12 697. On May 3, 2018 investigators went to **8510 10th Avenue West** and
13 observed the **black Dodge Durango (British Columbia FN508A)** parked on 10th
14 Avenue West just north of the building B. Investigators recognized the Durango, but now
15 it had British Columbia license FN508A. The registered owner was the same registered
16 owner as when the Durango had British Columbia license DW362B (Windy Merkel).
17 Investigators saw Locke come from building B and depart in the Durango. Locke later
18 returned and parked in the parking lot of the B building. Investigators followed Locke
19 into the building and saw Locke use a key to enter **Apartment B213**.

20 ***Most Recently***

21 698. A review of currently available toll data indicates **TT18** has been in contact
22 with **TT40** used by Morgan as recently as April 2, 2018 and with **TT3** used by Johnny
23 Davis as recently as May 9, 2018.

24 699. On May 15, 2018, Snohomish PUD identified Windy Markel as a utility
25 customer for **8510 10th Avenue West Apartment B213**. Markel is the registered owner
26 of the **black Dodge Durango (British Columbia FN508A)** driven by Locke.
27
28

1 700. On May 21, 2018, investigators saw the **black Dodge Durango (British**
 2 **Columbia FN508A)** parked at the apartment complex for **8510 10th Avenue West**
 3 **Apartment B213**. GPS data indicated that **TT18** was located in this vicinity overnight.

4 **LOVELL BROWN**

5 **Associated Locations: 1628 14th Place Northeast, Issaquah, Washington**

6 **Associated Vehicles: Blue BMW 750 (BBJ1643)**

7 701. Based upon intercepted calls, I believe Brown supplies Locke with cocaine,
 8 heroin, and unlawfully diverted pharmaceuticals. Discussed below, Lovell Brown was
 9 identified using TT43 for which a tracking warrant was authorized. GPS data indicated
 10 the TT43 was often in the vicinity of **1628 14th Place Northeast**, Issaquah, Washington
 11 during overnight hours. Brown was identified as the user of TT43 after investigators
 12 conducted physical surveillance contemporaneously with intercepted calls. TT43 is also
 13 subscribed to Brown. Brown provided Sprint **1628 14th Place Northeast** as his address.

14 ***November 3, 2017: Locke "needs" Brown to supply heroin***

15 702. On November 3, 2017, Locke using **TT18** called Brown using TT43
 16 (session 47). Locke asked if Brown talked to "unc" (uncle) about the "situation." Brown
 17 said he was going to call him now. Locke asked, "What he say about the other thing.
 18 Bringing it down or whatever." Brown said he was going say he wanted something
 19 different. Brown said they were going to bring the price down on the "new" "white
 20 ones." Brown said, "I got some of those old ones. It's a huge difference!" "So those have
 21 to come down." Based upon my training and experience, I believe that the "white ones"
 22 was a reference to cocaine, and the two discussed quality difference of previously
 23 received cocaine and currently supplied cocaine.

24 703. Locke said, "I need you bad." Brown said, "You need what?" Locke said,
 25 "The black situation bro." Brown said, "You need that bad huh." Locke said, "I had to try
 26 and get some from Russ. Trying to do something and they are like, they don't even want
 27 that." Brown asked, "It's different?" Locke said, "They like that shit I guess. But they
 28 complaining how sticky it is, but they like it." Brown said, "It's sticky but its potent he

1 said." Locke said, "It's that fentanental" (fentanyl) "that they putting in it." Brown said,
2 "Yeah, whatever they are doing to it." Based upon my training and experience, Locke
3 was referring to heroin when discussing the "black situation."

4 704. Brown asked, "You basically finished with that stuff or are you still
5 working on that?" Locke said, "I can cover it." "I've got a couple dollars" "if you need
6 the money right now." Brown said, "Let me know" "I'm not rushing." "When you are
7 finished with that, I can give you the ones you like." Brown said he could meet Locke
8 and bring Locke "a hundred of the other ones and you can cash me out. Then I'll go in
9 the morning and get, let me call" "about that other stuff" "I'll call you right back." Locke
10 asked, "Please." "Today. Not morning." Based upon my training and experience, the two
11 discussed money owed by Locke for previously provided unlawfully diverted
12 pharmaceuticals by Brown. I believe that Brown informed Locke that he had a hundred
13 additional pills at his disposal to provide Locke.

14 705. A few minutes later, TT43 returned the call to **TT18** (session 48). Brown
15 said, "He said he still waiting on some more of that shit. He gets it every three months."
16 "He still waiting on for the rest of that stuff to come." Locke asked, "So he don't have
17 none left?" Brown said, "None. Nothing." "But he said the guy was supposed to be here
18 anytime. He just waiting." "I told him I need some more." Based upon my training and
19 experience, I believe Brown inquired about obtaining heroin for Locke with his source of
20 supply. Based upon this conversation, Brown's heroin source of supply was currently out
21 of heroin.

22 ***November 2017: Brown supplies Locke with pharmaceuticals***

23 706. On November 13, 2017, **TT18** called TT43 (session 2347). During the call,
24 Brown told Locke that he was going to "Garfield's first basketball practice." Locke
25 asked, "I was seeing if you bringing that hundred of them things down there or
26 something." Brown responded, "Ok. I'll bring them with me." Locke asked about "the
27 other situation." Brown said he had not received a call back. Based upon my training and
28 experience, I believe Locke was requesting 100 pills of unlawfully diverted

1 pharmaceuticals. Locke also inquired about the heroin Locke and Brown previously
2 discussed.

3 707. Twenty minutes later, TT43 called **TT18** (session 2350). During the call
4 Brown asked, "How sure are you? I don't like carrying stuff with me if I don't have to."
5 "I will." "I got to count them out." "But if I don't have to, I like to just keep the shit at
6 home unless I know it's a hundred so I know I am going to get them off." Locke
7 explained that a subject was collecting money. Brown said, "Just let me know."

8 708. Later, TT43 called **TT18** (session 2446). During the call, Locke said, "I'm
9 ready to go." After discussing when and where to meet, Brown said, "Meet me there in
10 thirt ... fifteen minutes. Chick-fil-A." Investigators went to Chick-fil-A near downtown
11 Bellevue. Investigators observed the **black Dodge Durango (British Columbia**
12 **FN508A)** arrive and park at the AM/PM store across the street from the Chick-fil-A
13 Locke got out of the driver's seat and went into the store.

14 709. A few minutes later, TT43 sent a text message (session 2459) to **TT18**
15 reading, "Here." Investigators then observed a **blue BMW 750 (BBJ1643)** registered to
16 Lovell Brown parked in the AM/PM lot. Brown, identified from his Washington driver's
17 license photograph, got out of the BMW and walked over to the Durango and looked
18 inside the windows. Brown returned to the BMW and sat in the driver's seat.

19 710. Investigators then saw Locke walk to the driver's door of the BMW and
20 speak with Brown. Locke returned to the Durango. Locke then returned to the BMW and
21 got into the front passenger seat. A few minutes later, Locke got out of the **blue BMW**
22 **750 (BBJ1643)** and returned to the **black Dodge Durango (British Columbia FN508A)**.
23 Brown immediately departed in the BMW.

24 ***April 2018: Surveillance at 1628 14th Place Northeast***

25 711. On the morning of April 4, 2018 investigators saw the **blue BMW 750**
26 **(BBJ1643)** emerge from the alley leading to garage of **1628 14th Place Northeast** and
27 drive away. Investigators saw that the BMW was driven by a male matching the physical
28 description of Brown.

1 ***May 2018: Surveillance at 1628 14th Place Northeast***

2 712. On May 2, 2018, the garage door was open at **1628 14th Place Northeast**
 3 and the **blue BMW 750 (BBJ1643)** was parked inside. Investigators saw the BMW
 4 depart and followed it to a nearby Chipotle Restaurant. There they saw Brown get out of
 5 the BMW and go inside. On May 8, 2017, investigators again saw the BMW parked in
 6 the garage.

7 ***Most Recently***

8 713. A review of currently available toll data indicates **TT18** used by Locke has
 9 been in contact with TT43 as recently as May 9, 2018. On May 11, 2018, PSE identified
 10 Lovell Brown as a utility customer for **1628 14th Place Northeast**. Brown lists this
 11 address on his driver's license.

12 714. On May 21, 2018, investigators saw Brown arrive at **1628 14th Place**
 13 **Northeast** in the **blue BMW 750 (BBJ1643)** and park in the garage. Brown went into the
 14 residence with a grocery bag.

15 **CRYSTAL BARQUET**

16 **Associated Locations: 13045 Southeast 26th Street, Apartment B103**
 17 **Bellevue, Washington**

18 **Associated Vehicles: Blue Jaguar (AZJ2575)**

19 715. Crystal Barquet using **TT12** was the subject of a wiretap in November of
 20 2017. Investigators obtained authorization to intercept **TT12** after intercepting **TT12** over
 21 **TT1** used by Morgan and conducting a controlled purchase of cocaine from Barquet
 22 using **TT12** (discussed in the section regarding controlled purchases).

23 ***September 11, 2017: Surveillance at 13045 Southeast 26th Street, Apartment***
 24 ***B103***

25 716. On the morning of September 11, 2017 investigators observed a black
 26 Honda Civic (AWR2867) registered to Kimberly Guadalupe parked near **13045**
 27 **Southeast 26th Street, Apartment B103**, Bellevue, Washington. Investigators saw
 28 Barquet, identified from her driver's license photograph, momentarily walk out the

1 sliding door of the apartment and then go inside shortly afterwards. Investigators saw
2 Morgan come from the apartment carrying a backpack and two plastic bags. One of the
3 plastic bags contained a box. Morgan departed in a black Honda Civic. Investigators saw
4 Barquet come from the apartment and get into an awaiting vehicle and depart. Discussed
5 in the section regarding Davian Hunter, investigators believe that Morgan spotted law
6 enforcement surveillance as he left this apartment.

7 ***September 8, 2017: Barquet expects Morgan to supply her***

8 717. Based upon my participation in this investigation, discussion with other
9 agents involved with this investigation, and upon the content of intercepted
10 communications, I believe that those in Morgan's inner circle are disciplined in the use of
11 telephones with regards to drug trafficking. I believe that this discipline is an intentional
12 attempt to defeat law enforcement.

13 718. An example of this discipline by Morgan occurred during intercepted calls
14 between Morgan using ***TTI*** and Barquet using ***TTI2*** on September 8, 2017. During these
15 intercepted sessions (32, 41, 43, 46, 58), Morgan had an increasingly heated exchange
16 with Crystal Barquet. Investigators believe that Barquet had arranged for customers to
17 pick up drugs from her residence and expected that Morgan would supply the drugs in a
18 timely fashion, which he did not. During these conversations, Morgan continued to
19 maintain his discipline despite Barquet becoming increasingly angry and emotional. During
20 these calls, Morgan made statements like, "I couldn't get to where I needed to get to" (get
21 to where he could get access to drugs) and "I can't really go in all the fucking detail with
22 you otherwise I'm gonna be saying it" (over the phone).

23 719. On September 8, 2017, ***TTI2*** called ***TTI*** (session 32). Barquet asked
24 Morgan "are you busy?" Morgan responds, "Kind of sort of, yeah, what's up?" Barquet
25 told Morgan that "Jawuan and Sierra" were on their way to Barquet's residence. Morgan
26 asked, "What so you need me to come out there? I cannot come out there right now,
27 later." Barquet asked what time later and Morgan responded, "I know, I can't until after
28

1 seven. I mean, let me see what I can do. Maybe, maybe I might can do something. Let me
2 call you right back.”

3 720. Nearly an hour later, *TTI* called *TT12*. Morgan told Barquet he was
4 “waiting to see if I can get in where I need to go” before he comes over. Barquet said,
5 “Ok, well I mean, I don’t understand, but like I told you they were on their way here so
6 you could call me right back instead of having them keep coming thinking that you might
7 be able to make something happen.” Morgan said he was “trying” and told Barquet to
8 “shut the fuck up, man” as she communicated her anger that Morgan was not responding
9 in a manner she expected. Morgan said, “... there ain’t nothing I can do, it’s not my
10 fault.” The call ended abruptly.

11 721. Approximately ten minutes later, *TTI* called *TT12* (session 43). Barquet’s
12 tone was clearly upset, and Barquet informed Morgan “if you couldn’t make it work just
13 tell me so I could have stopped” Jawuan and Sierra “while they were still in Tacoma.”
14 Morgan said he was still “trying to work it out, but you need to calm down when you be
15 talking to me.” Barquet ended the conversation by stating, “trying to figure it out’ which
16 still tells me nothing.” Morgan using *TTI* and Barquet using *TT12* argued some more
17 during session 46.

18 722. During session 58 on *TTI* to *TT12*, Morgan and Barquet argued some
19 more. During the argument, Morgan said, “I couldn’t get to where I needed to get to.
20 Damn, like god damn.” Barquet responded, “I’m just saying you’re not letting me know
21 nothing.” Morgan said, “Like because I can’t really go in all the fucking detail with you
22 otherwise I’m gonna be saying it.” I believe Morgan was telling Barquet he did not want
23 to speak specifically about the details with Barquet over the phone in a conscious effort
24 to avoid incriminating statements.

25 723. During the call, Morgan said when he figured it out, he would call Barquet.
26 Barquet responded, “Well, I got, I got, so all I need to know is what I need to say,
27 because I got people just hanging, calling me back and stressing me out.” Based upon my
28 training and experience, I believe that Barquet arranged for customers to pick up drugs

1 from her residence and expected that Morgan would supply the drugs in a timely fashion,
2 which he did not. Barquet expressed her frustration that her drug customers were still
3 waiting for Barquet to be supplied by Morgan.

4 724. Based upon intercepted calls, Morgan and Barquet have a tumultuous
5 relationship. During interception of *TT40* (Morgan), GPS data indicated that *TT40*, and
6 thus Morgan, was often in the vicinity of Barquet's residence including during overnight
7 hours. Also during interception, Barquet learned that Morgan had a relationship with
8 Guadalupe.

9 ***March 2018: Barquet threatens to expose Morgan's activities to the police***

10 725. During a call on March 1, 2018, Barquet using *TT12* threatened Morgan
11 using *TT40*. During the call, Barquet stated she thought Morgan was going "to stop by"
12 because she needed some help. Barquet said Morgan was ignoring her. Morgan said he
13 just got to his phone. Monitors minimized parts of the call. During a spot check, Barquet
14 was intercepted saying, "a restraining order on you and her and I'm going to tell them
15 why. Because I need protection, I know too much about their dirty business." Barquet
16 grew increasingly emotional. Based upon my training, experience, and knowledge of this
17 investigation, I believe that Barquet was making reference to Morgan's drug business and
18 money laundering through businesses run by Guadalupe (discussed in the section below
19 regarding Morgan and Guadalupe).

20 726. Morgan attempted to speak over Barquet, "Why you keep talking about
21 telling? Like, what's up with all these threats? Why you ..." "This is why I can't talk and
22 communicate with you. Because all you keep doing is threatening me. Why do you keep
23 threatening me. You don't gotta keep threatening me." "That's not going to make me
24 come around to talk or deal with you."

25 727. Barquet continued, "I promise you this is not a threat." "The police station
26 is right here at Factoria Mall and I'm pulling up right now." "I'm done. I'm putting a
27 restraining order on you and her. I'm giving them your phone number, your address,
28 every information I got on you. Cause, you aren't going to leave my baby for dick. You

1 and that bitch is going to buy me a house or else ..." Morgan interrupted, "I don't give a
2 fuck about none of that shit" and one of the parties hung up. Based upon my training and
3 experience, not only do I believe Barquet was threatening to tell the police about
4 Morgan's drug trafficking and money laundering activities, I believe she was attempting
5 to extort Morgan for a house and monetary support.

6 728. On March 3, 2018, **TT40** called **TT12**. Barquet asked if Morgan got her
7 message. Morgan affirmed. The two had calm tones of voices. The two agreed to meet at
8 Barquet's mother's house.

9 ***May 2018: Surveillance at 13045 Southeast 26th Street, Apartment B103***

10 729. On May 6, 2018, investigators saw Barquet arrive at **13045 Southeast 26th**
11 **Street** in a **blue Jaguar (AZJ2575)**³⁵ with a female passenger. The two took items from
12 the trunk and placed them in an adjacent vehicle belonging to the passenger. The woman
13 departed in this vehicle. Barquet then used a key to enter **Apartment B103**.

14 ***Most Recently***

15 730. A review of currently available toll data indicates **TT47** used by Morgan
16 has been in contact with **TT12** as recently as May 9, 2018. On May 11, 2018, PSE
17 identified "Crystal Barquet" as a utility customer for **13045 Southeast 26th Street,**
18 **Apartment B103**.

19 731. On May 21, 2018, investigators saw the **blue Jaguar (AZJ2575)** parked
20 near **13045 SE 26th Street**.

21 ///

22 ///

23

24

25

26

27

28 ³⁵ Investigators have known Barquet to use this vehicle, first seeing her driving it on October 25, 2016, in downtown Seattle.

1 **JEVON GIPSON**

2 **Associated Locations: 3808 South Mason Avenue, Apartment E303**
 3 **Tacoma, Washington**

4 **Associated Vehicles: Black Hyundai Azera (BIH2915)**
 5 **Silver Mercedes S550 (BDT6285)**

6 732. Based upon intercepted calls and my knowledge of this investigation, I
 7 believe Morgan supplies Gipson with cocaine. Discussed below, Jevon Gipson was
 8 identified using TT61 for which a tracking warrant was authorized. TT61 is also
 9 subscribed to Gipson. Investigators also seized approximately one kilogram of cocaine
 10 from Gipson while conducting physical surveillance in conjunction with GPS data for
 11 TT61. Investigators also served a delayed notice search warrant at his residence. Gipson
 12 was booked into King County Jail after investigators seized the cocaine. Afterwards, GPS
 13 data indicated that TT61 began staying overnight at a new residence, **3808 South Mason**
 14 **Avenue, Apartment E303, Tacoma, Washington.**

15 ***February 2018: Gipson requests "one time" from Morgan***

16 733. On February 20, 2018, Morgan using **TT40** called Gipson using TT61
 17 (session 334). After greeting Gipson said, "Need you to slide through man and some uh,
 18 holla at ya." Morgan asked if Gipson was at the "crib" (home). Gipson said he just took
 19 off. The two agreed to meet later in the evening. Gipson said, "Yeah I just need you to
 20 slide through man." Morgan said, "I got you" (could provide Gipson with what he
 21 wanted). Gipson said, "Holla at you one time real quick." Based upon my training,
 22 experience, and knowledge of this investigation, I believe that when Gipson said "one
 23 time," he was likely requesting one kilogram of cocaine.

24 ***March 2018: Surveillance of TT61 and seizure of 1 kilogram of cocaine***

25 734. On March 12, 2018, investigators went to an apartment complex at on
 26 Macadam Road South in Tukwila, Washington. GPS data indicated for TT61 was in this
 27 vicinity. Investigators observed Jevon Gipson get into a white Kia Rio (BFE8321) and
 28 depart.

1 735. Investigators conducting surveillance at 2101 Southwest Sunset Boulevard
2 in Renton, Washington observed the Kia arrive at this apartment complex and park.
3 Gipson got out and opened the hatchback of the vehicle. Gipson, identified from his
4 driver's license photograph, went to the trunk, then looked both ways and behind himself.
5 Investigators saw Gipson remove a package wrapped in brown packaging material
6 consistent with the size of a kilogram of cocaine or other drug from the rear of the
7 vehicle. Investigators observed Gipson put the object into a black, possibly plastic, bag.
8 Gipson draped a coat over his arm and the black plastic bag, closed the hatchback, and
9 walked to Building A.

10 736. Investigators observed Gipson appear to use a key code or prox card to
11 access the common access lockout door to Building A. Investigators observed Gipson
12 walk to the third level and enter Apartment 308 using a key. Investigators observed
13 Gipson exit the apartment, walk to the Kia with a bag, and depart. Investigators followed
14 Gipson away until a uniformed Seattle Police Officer was able to stop the white Kia Rio
15 (BFE8321). The officer had Gipson step out of the vehicle. As Gipson stepped out of the
16 vehicle, the officer could see what was appeared to be, based upon his training and
17 experience, a one ounce package of cocaine or methamphetamine in the driver's door
18 storage compartment. The officer proceeded to frisk Gipson, finding a hard object in his
19 front right pants pocket. The officer removed the item, finding another ounce of
20 narcotics. A narcotics detective at the stop identified the substance as cocaine based upon
21 his training and experience. Investigators searched the vehicle for additional evidence,
22 finding approximately one kilogram of cocaine in the vehicle (field-test positive).

23 ***May 2018: Surveillance at 3808 South Mason Avenue, Apartment E303***

24 737. After the above-discussed seizure, GPS data indicated TT61 was in the
25 vicinity of **3808 South Mason Avenue, Apartment E303** during overnight hours. On
26 May 9, 2018, investigators saw a **silver Mercedes S550 (BDT6285)** registered to Gipson
27 and a **black Hyundai Azera (BIH2915)** also registered to Gipson parked in front of
28 building **E of 3808 South Mason Avenue**. Investigators saw Gipson exit the alcove

1 leading to **Apartment E303** and depart in the Hyundai. Gipson later returned in the
 2 Hyundai and parked in front of building E. Gipson walked into **Apartment E303**.

3 ***Most Recently***

4 738. After the search of Gipson's vehicle, investigators booked Gipson into
 5 King County Jail on state drug charges. Investigators maintained surveillance on 2101
 6 Southwest Sunset Boulevard, Apartment 308 to apply for a search warrant. While
 7 watching the apartment, Jakari Jones-Ford arrived and informed investigators that she
 8 resided there. She identified herself and was asked to come back later. On May 18, 2018,
 9 Tacoma Public Utilities identified Jakari Jones-Ford as a utility customer for **3808 South**
 10 **Mason Avenue, Apartment E303**.

11 739. On May 21, 2018, investigators saw the **black Hyundai Azera (BIH2915)**
 12 parked outside building E at **3808 South Mason Avenue**.

13 **ROBERT OTERO**

14 **Associated Locations:** **949 North 35th Street, Apartment 104**
 15 **Seattle, Washington**

16 **Associated Vehicles:** **Black Lexus LS (BCH9981)**
 17 **Black Acura TLX (BHX7569)**

18 740. Discussed below, Robert Otero was identified using TT62 for which a
 19 tracking warrant was authorized. Robert Otero is currently on federal supervision in two
 20 separate cases, one a conviction regarding conspiracy to distribute cocaine (in Alaska)
 21 and one for identity-theft related offenses (in this Court). Otero has reported to U.S.
 22 Probation that his phone number is TT62. Based upon intercepted calls, I believe Otero
 23 engages in drug trafficking with Morgan.

24 ***February 2018: Otero provides Hunter his address***

25 741. On February 14, 2018, Hunter using **TT17** received a call from Otero using
 26 TT62 (session 1938). Hunter and Otero talked about not speaking to each other for some
 27 time. At the end of the call, Otero asked Hunter to come over. TT62 then sent a text
 28 message to **TT17** reading, "949 w 35th st sea wa 98103" (session 1940). Discussed

1 below, investigators believe that Otero actually resides at **949 North 35th Street,**
 2 **Apartment 104** in Seattle.

3 *February 2018: Morgan and Otero exhibit caution with use of telephones*

4 742. On February 20, 2018, Morgan using **TT40** received a call from TT62
 5 (session 336). Otero told Morgan to download an app called "Wikr." Otero said, "You'll
 6 be good. You feel me. You never have to get another" (slight pause) "none of that shit no
 7 more. If you do it, make sure you don't go to add my contacts." Morgan said, "Ok."
 8 Otero said, "You know Facetime too." "They can't really get on Facetime." Morgan said,
 9 "Alright." Otero said, "I'm gonna Facetime you in a minute." Morgan said, "I ain't got
 10 no action." "I mean I might when I get home, I'm gonna see." Otero said, "Download
 11 that thing." Morgan said, "I'm going to. I'm about to go buy another phone actually."
 12 Otero said, "w ... i ... k ... r."

13 743. An internet search reveals that Wikr is an encrypted messaging service that
 14 offers self-destructing messaging. Based upon my training and experience, I believe that
 15 Otero was telling Morgan to use Wikr or Facetime to defeat law enforcement's ability to
 16 intercept their communications. When Otero paused (indicated above), I believe he
 17 intentionally interrupted himself from saying "phone" because Otero is aware that law
 18 enforcement does conduct wiretaps. When Otero referred to "they" in reference to
 19 Facetime, I believe he was referring to law enforcement's inability to intercept Facetime
 20 communications.

21 744. It is not unusual for Morgan and Otero to have long conversations
 22 anywhere from five to thirty minutes long. However, I believe based upon my training
 23 and experience, and knowledge of this investigation, Morgan and Otero limit their drug
 24 trafficking conversations to those that are in person and not over the phone. For example,
 25 on February 26, 2018, **TT40** called TT62 (session 598). During the call, Morgan said "I
 26 was at your spot. What you about to do. I was trying to holla at you real quick." Otero
 27 said, "I'm about to pull up on you." I believe that the purpose for their meeting was to
 28 discuss drug trafficking activities and to avoid having those discussions over the phone.

1 ***February 2018: Wheeler contacts Otero when unable to contact Morgan***

2 745. On February 28, 2018, Wheeler using **TT6** called TT47 used by Morgan
3 (session 2785). The call went directly to voicemail. **TT6** then called TT11 previously
4 used by Morgan³⁶ (session 2784). The call went to a message which stated the caller was
5 not able to accept calls. **TT6** then again called TT47 (session 2785) which went directly
6 to voicemail.

7 746. Immediately afterwards, **TT6** called Otero using TT62 (session 2786).
8 Wheeler asked, "Where brody at?" Otero said, "Huh?" Wheeler asked, "You talk to
9 brody?" Otero said, "Nah uh. Why? Something happen?" Wheeler said, "Nah. He ain't
10 answering the phone. Phone is going on the first ring." Otero said, "He at the house."
11 Wheeler said, "If you talk to him, tell him to call me." This was the only intercepted call
12 between **TT6** and TT62 during the 30-day interception period for **TT6**. Based upon my
13 training and experience, I believe that Wheeler urgently wanted to contact Morgan. When
14 he was unable, Wheeler contacted Otero, knowing he was a close associate of Morgan's.

15 ***February and March 2018: Surveillance of TT62 and TT40***

16 747. During February and March of 2018, GPS data indicated that TT62 was
17 commonly in the vicinity of an apartment complex located at **949 North 35th Street**,
18 Seattle, Washington. GPS data for **TT40** also indicated that Morgan frequented this
19 location.

20 ***March 2018: Morgan supplies Otero***

21 748. On March 3, 2018, TT62 called **TT40** (session 800). Otero said, "I forgot to
22 get that from you for the boy." Morgan said, "I gave that to you last night." "No the
23 other" "out of Tacoma." Morgan said, "I'll come down, give me a few minutes." "I'm
24 going to meet dude right now." "Why they so fucking scary bro?" Morgan responded,
25 "Them" dudes "is venomous. You know." Otero said, "They just waiting for me."
26
27

28 ³⁶ Investigators previously obtained a tracking warrant for TT11 and conducted physical surveillance in conjunction
with GPS data for the phone. Investigators determined Morgan used TT11.

1 Morgan said, "I'ma come down. So go do whatever you were going to do." "I'll be down
2 there by the time you get back." Based upon my training and experience, I believe Otero
3 had a pending drug transaction with someone from Tacoma and contacted Morgan to
4 obtain the drugs. I believe that when Otero described the third party as "scary," I believe
5 that Otero had not yet developed enough trust in the subjects he was dealing with.

6 ***March 6, 2018: Otero gets too specific on the phone with Morgan***

7 749. On March 6, 2018, **TT40** called TT62 (session 927). This was a long
8 conversation during which Otero recounted a street fight. At the end of the call, Otero
9 said, "Everything's good though" (referring to drug trafficking). Otero asked, "How are
10 you going to do the orders?" Morgan interrupted, "I'm just going to come down there and
11 talk to you." This was almost a five minute conversation prior to Morgan interrupting and
12 ending the call. Based upon my training and experience, I believe that Morgan ended the
13 call because the discussion turned to drug trafficking. Morgan expressed that he wanted
14 to speak in person.

15 ***March 2018: Morgan studies law enforcement***

16 750. On March 8, 2018, **TT40** called TT62 (session 987). Morgan stated, "I just
17 watch the coldest bust" "out here in Shoreline." Otero asked, "The Africans?" Morgan
18 said, "A little Mexican in a little newer Civic." "Remember when I talk to you about that
19 truck?" Otero affirmed. Morgan said, "That shit was real." Morgan said the truck was
20 there and went on to accurately describe several vehicles used by the Seattle Police
21 Narcotics Section. Morgan said "the big white boy" was the driver of the truck. Otero
22 asked, "Same one?" Morgan said, "Yup." Morgan stated he assumed that it was Seattle
23 Police and that he did not see anything that had "DEA" on it. Otero asked if they had
24 coats on. Morgan said they were wearing black coats.

25 751. I am assigned to the Seattle Police Narcotics Section. Detectives from this
26 section have been actively been involved in conducting surveillance during this
27 investigation. Morgan accurately described several vehicles used by the section and
28 accurately described the type of jackets worn by members of the section. Based upon my

1 training and experience, I believe that Morgan was studying the vehicles so he could be
2 on the lookout of any vehicles that may be conducting surveillance of him. I believe
3 Morgan recognized one of the vehicles ("the truck") from a prior occasion, when Morgan
4 was under surveillance during this investigation.

5 ***April 5, 2018: Surveillance of TT62 and 949 North 35th Street Apartment 104***

6 752. On April 5, 2018, GPS data indicated TT62 was in the area of Renton,
7 Washington. Investigators went to **949 North 35th Street**, Seattle, waiting for Otero to
8 return. A **black Lexus LS (BCH9981)** registered to Otero was parked in the alley south
9 of the apartment building.

10 753. An hour and a half later, investigators saw Otero arrive at **949 North 35th**
11 **Street** in the alley. Investigators were unable to see what vehicle Otero arrived in.
12 Investigators saw Otero use a key to enter the rear sliding door of an apartment on the
13 first floor of the complex. Otero went inside and closed all the blinds to the apartment.
14 Investigators saw that **104** was marked on the front of the apartment. GPS data indicated
15 that TT62 also arrived in the vicinity.

16 754. According to Seattle City Light records for **949 North 35th Street**,
17 **Apartment 104**, on March 20, 2018, they received a call from "Kimberly with Morgan
18 Real estate – they want bill mailed to them at **5720 220th Street Southwest Mount Lake**
19 **Terrace WA 98043 (ph#206-486-0448)** – they will email a copy of the agreement and
20 want a paper copy bill mailed to them."

21 ***May 2018: Surveillance at 949 North 35th Street, Apartment 104***

22 755. On May 3, 2018, investigators saw a **black Lexus LS (BCH9981)** parked
23 in a stall near the rear entrance of **Apartment 104**.

24 756. On May 15, 2018, investigators went to **949 North 35th Street** and
25 observed a **black Acura TLX (BHX7569)** parked in a guest parking spot directly in front
26 of **Apartment 104**. Investigators left and later returned, finding that the Acura was no
27 longer there. Investigators saw Otero driving the Acura return and park. Otero, identified
28

by his Washington driver's license photograph, got out of the Acura with a full backpack and used a key to unlock the rear sliding glass door of **Apartment 104**.

Most Recently

757. A review of currently available toll data indicates TT47 used by Morgan has been in contact with TT62 as recently as May 9, 2018. On May 21, 2018, investigators saw the **black Lexus LS (BCH9981)** in a stall near the rear entrance of **Apartment 104**.

TABID MOHAMED

**Associated Locations: 7923 Martin Luther King Jr. Way South,
Apartment 302
Seattle, Washington**

**Associated Vehicles: Gold Lexus LS (BHY4179)
Black BMW 750 (BCG6090)**

758. Based upon intercepted calls, I believe Morgan supplies Mohamed with cocaine. Discussed below, Tabid Mohamed was identified using TT60 for which a tracking warrant was authorized. Investigators conducted physical surveillance in conjunction with GPS data for TT60 and determine Mohamed used this phone.

February 2018: Mohamed needs "more"

759. On February 13, 2018, Morgan using **TT40** received a call from Mohamed using TT60 (session 9). During the call, Mohamed said, "I'm all the way ready." Morgan asked, "Where you at, the crib?" Mohamed responded, "Yeah." "I need more." Morgan said, "I'll be up" and something unintelligible. About an hour and a half later, **TT40** called TT60 (session 15). Morgan asked where Mohamed was at. Mohamed said he was "at River" and asked Morgan where he was at. Morgan said, "I'm at you house man, I told you I was coming bro." Mohamed said he would be there in five minutes. Based upon my training and experience, I believe the Mohamed was requesting that Morgan resupply him. Based upon my knowledge of this investigation, I believe that Morgan supplied him with cocaine.

///

February 2018: Mohamed has money for Morgan

760. On February 24, 2018, **TT40** called TT60 (session 523). During the call Mohamed discussed being at the casino. Morgan mentioned not hearing from Mohamed. Mohamed said that he had "I still have like four and a half." Mohamed stated that he had called Morgan earlier because he had "five" for Morgan. Morgan interrupted saying, "I'll catch up with you."

761. Based upon my training and experience, I believe that when Mohamed mentioned he had four and a half left, he was stating that he had, possibly, four and half ounces of cocaine left. As noted elsewhere in this Affidavit, four and a half ounce of cocaine, also referred to as a "baby," is a common unit of cocaine. When Mohamed stated that he had "five" for Morgan, I believe he was referring to \$5,000 in drug proceeds. I believe that Morgan interrupted Mohamed because Mohamed was speaking too specifically on the phone.

February 2018: Morgan supplies Mohamed

762. On February 26, 2018, TT60 called **TT40** (session 614). During the call, Morgan said he would be "down that way in a couple of hours." Mohamed said, "I need some too." In an annoyed tone, Morgan responded, "I'll call you man. When I get down that way brotha." Based upon my training and experience, I believe Mohamed was requesting to be resupplied by Morgan. I believe that Morgan's annoyed response was due to Mohamed speaking explicitly on the telephone regarding his "need" for "some."

763. The following day, on February 27, 2018, **TT40** called TT60 (session 655). Morgan asked where Mohamed was. Mohamed said he was in Bellevue and was heading north. Morgan said to give him a call when Mohamed got back. Mohamed asked, "Are you ready?" Morgan responded, "Give me a call when you get back." Mohamed asked, "You sure" and giggled. Mohamed then said, "I got you bro." Based upon the context of these calls, Morgan did not meet with Mohamed the previous day, and the two were arranging a new meeting time.

1 764. On March 5, 2017, **TT40** called TT60 (session 885). Morgan asked where
2 Mohamed was. Mohamed said he was "at the house." Morgan said he would be over.
3 During session 886, **TT40** called TT60. Morgan asked to be let in. Mohamed said, "Press
4 three-o-two" (**7923 Martin Luther King Jr. Way South, Apartment 302**).

5 ***March 2018: Surveillance of TT60***

6 765. On March 19, 2018, GPS data for TT60 indicated the phone was in the
7 vicinity of **7923 Martin Luther King Jr. Way South, Seattle, Washington**. There,
8 investigators saw a **gold Lexus LS (BHY4179)** registered to Mohamed at address **7923**
9 **Martin Luther King Jr. Way South, Apartment 302**. While watching the Lexus,
10 investigators observed two subjects get into the vehicle and depart. Investigators took
11 photographs of the subjects, identifying the driver later as Mohamed after obtaining his
12 driver's license photograph. GPS data for TT60 also indicated that the phone departed the
13 vicinity.

14 766. Investigators followed the **gold Lexus LS (BHY4179)** to the Rainier Beach
15 Safeway. Mohamed parked the Lexus in the middle of the parking lot for several minutes.
16 Investigators saw an unidentified male approach the Lexus. During this time, GPS data
17 indicated that TT60 was also in this vicinity. A few minutes later the Lexus left the area.

18 767. Later, GPS data indicated that TT60 was in the vicinity of another nearby
19 Safeway on South Othello Street in Seattle. Investigators went to that location and saw
20 the **gold Lexus LS (BHY4179)** parked in the lot.

21 768. On March 21, 2018, GPS data for TT60 indicated the phone was in the
22 vicinity of a strip mall parking lot at 3820 Rainier Avenue South, Seattle. Investigators
23 arrived and saw Mohamed sitting in the driver's seat the **gold Lexus LS (BHY4179)**.
24 Mohamed was alone in the vehicle. Investigators observed Mohamed depart in the Lexus
25 alone. GPS data also indicated that TT60 departed the vicinity.

26 ///

27 ///

1 ***May 2018: Surveillance at 7923 Martin Luther King Jr. Way South, Apartment***
 2 ***302***

3 769. On May 23, 2018, investigators saw Mohamed arrive at **7923 Martin**
 4 **Luther King Jr. Way South** in a **black BMW 750 (BCG6090)**. Investigators watched
 5 Mohamed contact several people in the parking lot over a period of hours. Investigators
 6 saw that one of the people got into the BMW with Mohamed for a few minutes and
 7 depart. Based upon training and experience, investigators believe that Mohamed was
 8 conducting drug transactions.

9 ***Most Recently***

10 770. A review of currently available toll data indicates **TT40** used by Morgan
 11 has been in contact with TT60 as recently as April 30, 2018.

12 771. On May 24, 2017, investigators went in uniform to **7923 Martin Luther**
 13 **King Jr. Way South** to gain access to this lockout building. A property manager asked
 14 to speak with investigators. Management complained about Mohamed and the number of
 15 suspicious visitors he had. Management showed investigators records that Mohamed had
 16 been a resident of **Apartment 302** for a number of years. While there, Mohamed arrived
 17 in the **black BMW 750 (BCG6090)**. Management allowed investigators to watch
 18 security video surveillance footage of Mohamed walking from the BMW and into
 19 **Apartment 302** using a key.

20 **JON WILLIAMS**

21 **Associated Locations: 2604 Cascade Place West, Apartment 10**
 22 **University Place, Washington**

23 **Associated Vehicles: White GMC Savana (058ZAD)**

24 772. Based upon intercepted calls and my knowledge of this investigation, I
 25 believe Morgan supplies Williams with cocaine. Discussed below, Jon Williams was
 26 identified using TT58 for which a tracking warrant was authorized. Investigators
 27 conducted physical surveillance in conjunction with GPS data and determined that
 28 Williams used TT58.

February 2018: Williams contacts Morgan to be supplied

773. On February 24, 2018, Morgan using **TT40** received a text message from Williams using TT58 reading, "call my phone .me and Tim trying to come see you" (session 478). Several hours later TT58 called **TT40** (session 510). Morgan answered and said he would call Williams a little later. Williams said he could, "come that way right now." Morgan told Williams no and that he was at a family function.

774. On February 25, 2018, **TT40** called TT58 (session 552). During the call, Williams said, "I was trying to come see you last night, you said you was functioning with the family huh?" Morgan affirmed and said he could meet Williams in about three hours because he had some things to do. Williams said, "Ok. Yeah that's cool." Morgan said, "I got you."

775. Approximately two hours later, **TT40** called TT58 (session 553). Morgan asked where Williams was. Williams asked if Morgan was "at the house right now?" Morgan affirmed. Williams said he would be right there. More than fifteen minutes later, **TT40** again called TT58 (session 554); Williams said, "I'm right down the street. 'I'll pull up in a sec."

776. Based upon my training and experience, I believe these calls were made to arrange a drug transaction. Morgan appears to stick to his MO by maintaining discipline on the phone, and making his in-person meetings and/or transactions at Williams's residence. Even though Morgan is disciplined with his use of the telephone with regards to drug trafficking, I believe that his comment of "I got you" to Williams was an indication to Williams that he would be able to supply Williams with drugs.

March 2018: Williams facilitates drug transactions for others

777. On March 11, 2018, **TT40** called TT58 (session 1114). Williams said, "My brother and Tim was trying to come see you. I still got mine, but my brother was trying to come down there. Him and Tim." Morgan told Williams "maybe later" because Morgan was doing something. Williams said, "I'll let him know." Based upon my training, experience and knowledge of this investigation, I believe that Williams was attempting to

1 facilitate obtaining cocaine for his brother and Tim. I believe that Williams informed
2 Morgan that Williams did not need to be resupplied when he said, "I still got mine."

3 ***March 2018: Surveillance of TT58***

4 778. GPS data for TT58 indicated that the phone was often in the vicinity of in
5 the 2600 block of Cascade Place West in University Place, Washington. This is the
6 location of the Stratford Heights apartments.

7 779. On March 19, 2018, GPS data indicated that TT58 was in the vicinity of the
8 Westside Estates Apartment complex on North Pearl Street in Tacoma. Investigators
9 went to that location and monitored vehicles as they left the area. One of the vehicles that
10 left the area was a **white GMC Savana (058ZAD)** registered to Williams. GPS data later
11 indicated that TT58 was in the vicinity of **2604 Cascade Place West**. Investigators went
12 to that location found the GMC Savana in the parking lot. The white Savana was still
13 warm to the touch.

14 780. On March 20, 2018, GPS data indicated that TT58 was in the vicinity of the
15 **2604 Cascade Place West**. Investigators went to that location and saw Williams and an
16 unidentified passenger get into the **white GMC Savana (058ZAD)**. Investigators
17 identified Williams from his driver's license photograph. After Williams departed, GPS
18 data indicated that TT58 also departed.

19 781. GPS data indicated TT58 was in the vicinity of North G Street and North
20 4th Street in Tacoma. Investigators went to that location and saw the GMC Savana
21 parked on the street near an apartment complex on North G Street. Investigators saw
22 Williams and his passenger get into the GMC Savana and depart. GPS data indicated
23 TT58 departed as well.

24 782. Investigators went to **2604 Cascade Place West** to wait for Williams to
25 return. Eventually, Williams returned in the **white GMC Savana (058ZAD)** alone.
26 Investigators watched as Williams walked towards **2604 Cascade Place West** and used a
27 key to go into **Apartment 10**. GPS data indicated that TT58 was also in the vicinity.
28

1 783. On March 21, 2018, GPS data indicated TT58 was in the vicinity of the
 2 **2604 Cascade Place West**. Investigators observed Williams come from **Apartment 10**.
 3 Williams departed alone in **white GMC Savana (058ZAD)**. GPS data indicated that
 4 TT58 also departed.

5 784. Investigators followed the GMC Savana to a nearby Fred Meyer.
 6 Investigators saw the GMC Savana park next to a silver Impala. Investigators saw a
 7 person come from the silver Impala, approach the driver's door of the GMC Savana.
 8 Williams had his driver's side window open. After a few minutes, the unknown person
 9 got back into the silver Impala and departed. The GMC Savana returned to **2604 Cascade**
 10 **Place West**. Based upon my training and experience, this interaction is consistent with
 11 that of a drug transaction.

12 ***May 2018: 2604 Cascade Place West, Apartment 10***

13 785. On May 9, 2018, investigators observed the **white GMC Savana**
 14 **(058ZAD)** at **2604 Cascade Place West**. Investigators saw Jon Williams and another
 15 male exit the fourth yellow door from the north on the east side of the building. Both got
 16 into the GMC Savana and appeared to smoke from a vaping device. Afterwards, both
 17 returned to the same door. The fourth yellow door from the north appears to be the back
 18 door to **Apartment 10** which has a front door on the opposite (west) side of the building.

19 ***Most Recently***

20 786. A review of currently available toll data indicates **TT40** used by Morgan
 21 has been in contact with TT58 as recently as April 21, 2018. Williams currently has two
 22 vehicles, other than the GMC Savana, registered to **2604 Cascade Place West**,
 23 **Apartment 10**. On May 21, 2018, Tacoma PUD identified Williams as a utility customer
 24 at **2604 Cascade Place West, Apartment 10**, since June 2014.

25 787. On May 24, 2018, investigators saw the **white GMC Savana (058ZAD)** at
 26 **2604 Cascade Place West**.

27 ///

28 ///

1
2 **ANTHONY DAO**

3 **Associated Locations: 9220 South 198th Street**
4 **Renton, Washington**

5 **Associated Vehicles: Gray BMW X5 (BGE2269)**
6 **Black Mercedes 320 (177XPM)**

7 788. Discussed below, Anthony Dao was identified using **TT19** for which wire
8 and electronic interception and tracking warrants were authorized. The interception of
9 **TT19** was authorized after intercepting Dao using **TT19** speaking to Morgan using **TT1**.
10 Interception indicated that Dao and Morgan were engaged in drug trafficking.
11 Interception of **TT19** indicated Dao was a distributor of large amounts of marijuana.

12 ***September 2017: Surveillance of TT19***

13 789. On September 21, 2017, GPS data indicated that **TT19** was in the vicinity
14 of **9220 South 198th Street** in Renton. Investigators went to that residence and located a
15 **gray BMW X5 (BGE2269)** registered to Brian Dao at 560 South 330th Place in Federal
16 Way. Many hours later, GPS data for **TT19** indicated that the phone was in the area of
17 560 South 330th Place in Federal Way. Investigators went to that location and located a
18 **black Mercedes 320 (177XPM)** registered to Anthony Dao registered to 560 South
19 330th Place. Approximately 20 minutes later, investigators observed the Mercedes drive
20 away from the residence. GPS data indicated that **TT19** departed the area at
21 approximately the same time.

22 790. On September 25, 2017, GPS data for **TT19** indicated that the phone was in
23 the vicinity of **9220 South 198th Street**. Both the **gray BMW X5 (BGE2269)** and the
24 **black Mercedes 320 (177XPM)** were parked there.

25 791. Several hours later, GPS data indicated that **TT19** was in the vicinity of the
26 Jefferson Community Center on Beacon Hill in Seattle. Investigators found the **BMW X5**
27 **(BGE2269)** parked there. A little over ten minutes later, investigators saw Anthony Dao,
28 identifying him from his driver's license photograph, together with a woman and a child,

1 get into the gray **BMW X5** and depart. GPS data for **TT19** departed at approximately the
2 same time.

3 *November 2017: Marijuana negotiations*

4 792. On November 9, 2017, **TT19** called an unknown male (UM8518) using
5 206-409-8518 (session 29). UM8518 said, "My friend told nine fifty ok?" (\$950 per
6 pound of marijuana). Dao said no. UM8518 asked, "Only nine hundred?" (\$900 per
7 pound). Dao said yes. UM8518 said he would call his friend. **TT19** then exchanged a
8 series of text messages with 206-409-8518 (including sessions 31, 36, 37, 38, 45). 206-
9 409-8518 sent, "My friend talk 900." **TT19** responded, "Yes how many." 206-409-8518
10 responded, "28" and "28(900)." **TT19** sent, "Tomorrow." Based upon my training,
11 experience, and knowledge of this investigation, I believe that Dao was negotiating for 28
12 pounds of marijuana for \$900 per pound.

13 793. At approximately 7:37 p.m., **TT19** called 206-409-8518 (session 80). Dao
14 asked, "How long before you can bring the food?" UM8518 asked, "You home?" Dao
15 said, "Yeah I'm home." UM8518 said, "Maybe one hour." Two minutes later 206-409-
16 8518 called **TT19** (session 81). UM8518 said, "Hello Tony" "My friend thought one hour
17 in your home." Dao said, "My friends here that's why." Later 206-409-8518 sent a text
18 message to **TT19** reading, "9:00 in you home" (session 82).

19 794. At approximately 8:52 p.m., **TT19** received a call from 206-409-8518
20 (session 89). UM8518 said, "I'm outside" "You open the door?" Dao said he would. At
21 approximately the same time, investigators monitoring video surveillance observed a
22 vehicle pull into the driveway of **9220 South 198th Street**. GPS data indicated **TT19** was
23 also in the vicinity of this residence. Approximately twenty minutes later, the vehicle
24 departed.

25 795. On November 10, 2017, **TT19** called an unknown male (UM9420) using
26 206-484-9420 (session 88). This call occurred in Vietnamese and was translated by
27 professional linguists. Dao said, "I just gave it to Tiger to buy. But later when he give it.
28 How much? How much do I owe you? Huh? Thirty five, right?" UM9420 said, "Yeah!

1 Thirty five pieces, eight twenty five and, uh, eight twenty five multiply thirty five plus
2 the other money is forty three fifty” (35 pounds of marijuana x \$825 per pound + owed
3 money). Dao responded, “Twenty eight seventy five” (\$28,875 owed for the 35 pounds of
4 marijuana).

5 796. The two went on to discuss some marijuana that UM9420 would be able to
6 obtain. UM9420 described the marijuana, “It’s a smelly stuff. I found the odor kinda
7 weird. It’s an odor at once kinda foul and good not just foul smelling.” “I know that it it
8 is not Bubba.” Dao asked, “Could it be White Gold?” UM9420 said, “It’s not White
9 Gold. White Gold does not fucking have an odor. This one has an odor, a strong odor.”
10 Based upon my training, experience, and knowledge of this investigation, I know that
11 Bubba and White Gold are strains of marijuana.

12 ***March 2018: Morgan attempts to get in contact with Dao***

13 797. On March 1, 2018, Morgan using ***TT40*** called (session 714) ***TT19*** (used by
14 Dao previously intercepted by investigators). Morgan received a message stating the
15 number was no longer reachable.

16 798. During interception of ***TT1***, Dao using ***TT19*** identified himself as “T
17 Asian” (session 482) and “T” (session 506) to Morgan.

18 799. On March 3, 2018, ***TT40*** called ***TT6*** used by Wheeler (session 3378).
19 Morgan said, “I called you last night hella times.” “I was calling you all night.” Wheeler
20 said he called as soon as he got up. Morgan asked, “Did you get T’s number?” Wheeler
21 responded, “Nah” “He act like he didn’t want to give to me man.” “I’ll try to get it from
22 Pete.” Morgan said, “I’m mean that’s cool” “But uh ... remember what your brother was
23 talking about? Remember what he was talking about?” He “was like he aint fucking with
24 dude?” Wheeler said, “Yeah.” Morgan said, “Yup.” Wheeler responded, “Oh alright
25 alright alright alright.”

26 800. Based upon the tone and cadence of Morgan’s and Wheeler speech, and
27 based upon my training, experience, and familiarity with this investigation, I believe that
28 when Morgan was asking if Wheeler remembered what his brother was talking about, I

1 believe Morgan was communicating the arrest of a particular person and the possibility
2 they may be cooperating with law enforcement. Based upon the details below, I believe
3 that when Morgan was asking for "T's" number, he was asking for Dao's number.

4 801. On March 3, 2018, **TT6** sent a text message to TT47 reading, "What
5 number you want me to give T Bullshit" (session 3417). After receiving no response,
6 **TT6** sent the following text messages to TT47. "206-877-3526" (session 3422) and "T
7 Bullshit" (session 3424).

8 802. I obtained subscriber and toll records for 206-877-3526. Service was
9 activated on November 12, 2017, and the account holder name was listed as "James
10 BJBH" (certainly a fictitious name). This is the same date that **TT19** received a text
11 message from AT&T reading, "AT&T Free Msg: Your plan did not renew on schedule. If
12 you have not paid already, pleas to go to att.com/myprepaid or call 611." Investigators
13 ceased the interception **TT19** a few day later because the plan was not renewed.

14 803. A review of toll records for 206-877-3526 show that three of the numbers
15 in contact with this number were also intercepted over **TT19**, including one number
16 whose caller was identified as "Pete" (session 87 with 206-430-2664), which I believe
17 could be the person Wheeler intended to get Dao' phone number from.

18 804. Based upon these circumstances, I believe Dao uses 206-877-3526 and
19 Morgan was attempting to contact Dao for the purposes of drug trafficking on March 1,
20 2018.

21 ***May 2018: Surveillance at 9220 South 198th Street***

22 805. On May 10, 2018, investigators saw the gray BMW X5 (BGE2269)
23 parked in the driveway of 9220 South 198th Street and saw Dao taking something out of
24 the vehicle.

25 ***Most Recently***

26 806. A review of currently available toll data indicates 206-877-3526 believed to
27 be used by Dao has been in contact with 206-484-9420 used by UM9420 as recently as
28 May 10, 2018, and 206-430-2664 used by "Pete" as recently as March 31, 2018.

807. On May 11, 2018, PSE identified "Tony" Dao as a utility customer for 9220 South 198th Street. On May 22, 2018, both the gray BMW X5 (BGE2269) and the black Mercedes 320 (177XPM) were parked in the driveway of 9220 South 198th Street.

MICHAEL MORGAN AND KIMBERLY GUADALUPE

Associated Locations: 21557 35th Place West, Brier Washington

Associated Vehicles: Green Honda Civic (BGK1218)³⁷
Silver Honda Odyssey (AUJ9144)³⁸

808. Michael Morgan was the original subject of this investigation. Investigators are currently tracking TT47 used by Morgan. GPS data indicates that Morgan resides at 21557 35th Place West, Brier, Washington, based upon the amount of time TT47 is at this location, including during overnight hours. This has been consistent for the tracking of TT40 as well during the interception of TT40.

Surveillance at 21557 35th Place West

809. On November 11, 2017, TT17 used by Danavian Hunter called TT40. Hunter told Morgan that "Ray" (Railen Wheeler) wanted to talk to him. Wheeler then got on the phone.³⁹ Wheeler said he wanted to visit and see the baby. Morgan provided the address "Two one five, five seven thirty fifth place west, Brier, Washington" (21557 35th Place West). According to the Snohomish County Assessor website, Kimberly Guadalupe purchased 21557 35th Place West on October 27, 2017.

810. On March 1, 2018, the electronic intercept system captured a multi-media message sent from Guadalupe using 206-779-6769 to TT40. This message contained screenshots of what appeared to be security surveillance footage capturing a Ford Explorer driving into a driveway. I examined the landscape in the screenshot and then

³⁷ This vehicle was discussed in the sections regarding Wheeler and Johnny Davis.

³⁸ On September 10, 2017, during intercept of TTI, investigators conducted physical surveillance in conjunction with GPS data for TTI, during which investigators saw Guadalupe, identified from her Washington driver's license photograph, driving this vehicle with Morgan as the passenger.

³⁹ I recognized Wheeler's voice from intercepts over TT6 and TT41.

viewed Google Maps Satellite imagery of **21557 35th Place West**. The screenshot from the security surveillance footage appears to depict the area around **21557 35th Place West**.

May 2018: Surveillance of 21557 35th Place West

811. On May 7, 2018, investigators used an aircraft equipped with a video camera to surveil **21557 35th Place West**. I reviewed this footage. It appeared that a **silver Honda Odyssey AUJ9144** registered to Morgan at address **5720 220th Street, Suite A** arrived. I could not see the license plate, but have viewed surveillance photographs of the vehicle taken on September 10, 2017, which showed Guadalupe as the driver and Morgan the passenger. I believe that the vehicle seen during aerial surveillance and vehicle in the mentioned photographs were the same. A woman got out of the vehicle and then aerial surveillance lost the view.

Most Recently

812. On May 14, 2018, Snohomish PUD identified Kimberly Guadalupe as a utility customer for **21557 35th Place West**.

813. As discussed, Morgan is surveillance conscious. As described, it appears that Morgan and Guadalupe have their own video surveillance at **21557 35th Place West** and receive alerts and video via cellphone if there is any activity at the home. Because of this, investigators have refrained from conducting physical surveillance at the residence. Investigators are currently tracking TT47. TT47 has been at **21557 35th Place West** overnight as recent as May 23, 2018.

MORGAN REAL ESTATE MANAGEMENT

**Associated Locations: Morgan Real Estate Management
5720 220th Street Southwest
Mountlake Terrace, Washington**

Associated Vehicles: No associated vehicles sought

814. The business location for **Morgan Real Estate Management** is at **5720 220th Street, Mountlake Terrace, Washington**. Its website describes the business as a

1 property management company that also offers services for painting, landscaping, and
 2 maintenance. The website lists the company address as **5720 220th Street**. I believe
 3 evidence of money laundering will be found at this business.

4 815. U.S. Attorney's Office OCDETF Auditor Becky Carnell has been
 5 conducting the investigation into the DTO's money laundering and illicit assets. As part
 6 of the investigation to date, we have obtained and reviewed business and employment
 7 records, tax records, Washington State Employment Security Department income
 8 records, bank records, mortgage loan files, escrow files, and other financial information.

9 816. According to the Washington State Employment Security Department,
 10 Michael Morgan claimed an income of just over \$4,000 a year in 2015 and 2016 from
 11 Morgan Real Estate Management. Interestingly, there are several operating businesses
 12 which bear Morgan's name: Morgan Real Estate Management LLC, Morgan Rentals
 13 LLC, Morgan IRA 1 LLC, and Morgan IRA 2 LLC. However, in reviewing business
 14 ownership records and accounts associated with these companies, investigators do not
 15 find any evidence that Michael Morgan actually owns or operates these companies.
 16 Instead, records indicate that Kimberly Guadalupe owns and operates these companies.

17 ***Morgan enforces rent payment to Morgan Real Estate Management***

18 817. A review of bank records associated with accounts used by Guadalupe and
 19 Morgan Real Estate Management LLC and accounts associated with Wheeler shows that
 20 Wheeler is a tenant at **20529 61st Place West** under management by Morgan Real Estate
 21 Management LLC. Wheeler has obtained cashier checks, purchased with cash, to make
 22 rent payments to Morgan Real Estate Management on numerous occasions. Investigators
 23 believe that the source of the cash is drug proceeds.

24 818. The wiretap has provided evidence with regards to the money laundering
 25 activity of Michael Morgan. Investigators believe that while accounts and businesses are
 26 in Guadalupe's name, Morgan still maintains control. For example, on February 13,
 27 2017, TT47 called **TT6** used by Wheeler. Morgan said, "Your rent." "I don't know if
 28 you're behind on it or whatever but it says twenty-two eighty-eight." Wheeler began

1 stuttering and attempted to provide an explanation. Wheeler said, "I'm about to get the"
2 "the insurance thing now. I'm about to uh, fax it to her now." Morgan said, "Not the
3 insurance" "I'm talking about the rent." Wheeler said, "The rent! The twenty-two eighty-
4 eight! I know what it ... Bro I know!" Morgan said, "Listen." "You never been on time
5 for the two years you've been staying there. You gotta start handling you shit bro."
6 Morgan said they were friends, "But this is business bro." Morgan continued, "I don't
7 want to have to be calling you with this shit, and she's trying to be cool because of our
8 relationship." "But this is still ..." Wheeler interrupted, "Man I'm on the way to take care
9 of that shit" "right now man." "Before I do anything else man."

10 819. Railen Wheeler opened Wells Fargo Bank checking and savings accounts
11 on February 2, 2016, at the Renton Village Branch, checking account ***9482 and
12 savings account ***9228. From account opening through March 24, 2017, when the
13 account was closed, Wheeler's checking account ***9482 had a total of more than
14 \$26,000 in deposits; of that amount, at least \$12,708 consisted of cash. \$7,992.66
15 consisted of automatic payroll deposits for Wheeler.

16 820. Several of the cash deposits appeared to be deposited for the specific
17 purpose of paying rent to Morgan Real Estate Management. For example, on April 5,
18 2016, \$1,950 in cash was deposited to Wheeler's account. The same day, he withdrew
19 \$1,695 to purchase a cashier's check payable to Morgan Real Estate Management. On
20 September 7, 2016, a \$1,825 cash deposit was made to the account; these funds were
21 used to pay Morgan Real Estate \$1,825 for rent.

22 821. Based upon my training, experience, and knowledge of this investigation, I
23 believe that Morgan is Wheeler's cocaine source of supply. During interception of **TT6**
24 and **TT41** used by Wheeler, there was no evidence that Wheeler had legitimate
25 employment, instead making his money through drug trafficking. I believe that Wheeler
26 used drug proceeds to pay his rent. Morgan seems to benefit from this arrangement by
27 having Guadalupe's company receive a portion of rent payments which originated from
28 Morgan's distribution of drugs.

Otero's residence managed by Morgan Real Estate Management

822. As previously discussed, according to Seattle City Light records for **949 North 35th Street, Apartment 104**, on March 20, 2018, they received a call from "Kimberly with Morgan Real estate – they want bill mailed to them at **5720 220th St SW** Mount Lake Terrace WA 98043 (ph#206-486-0448) – they will email a copy of the agreement and want a paper copy bill mailed to them."

823. As with Wheeler, I believe that Morgan is Otero's cocaine source of supply. Based upon my training and experience, I believe Otero is using drug proceeds to pay rent and for utility bills through **Morgan Real Estate Management**.

Evidence that Guadalupe engages in money laundering

824. In March 2016, Guadalupe purchased 14417 49th Place West, Edmonds, Washington. Closing funds for the purchase were made with the following negotiable instruments purchased by Guadalupe and one wire from Guadalupe's account:

Check/Wire	Date	Amount
US Bank CC ⁴⁰ 3343513399	February 26, 2016	\$5,000
US Bank CC 3343513398	February 26, 2016	\$5,000
US Bank CC 3343513397	February 26, 2016	\$5,000
WF ⁴¹ CC 0696201572	February 26, 2016	\$5,000
WF CC 6294601171	February 26, 2016	\$2,900
WF CC 6294601170	February 26, 2016	\$2,500
WF CC 6294601169	February 26, 2016	\$2,787.21
US Bank CC 3343513405	February 29, 2016	\$5,000
Wire From US Bank ***7210	March 1, 2016	\$3,564.87

825. Based upon the review of currency transaction reports (CTR's) filed by U.S. Bank and Wells Fargo Bank, the cashier's checks listed above were purchased with cash. Based upon my training and experience, it appears that multiple checks were

⁴⁰ CC is short for "cashier's check"

⁴¹ WF is short for "Wells Fargo."

1 purchased at multiple bank/branch locations in an attempt to structure the purchase of the
2 cashier's checks to avoid bank reporting requirements to government of cash deposits
3 over \$10,000. I suspect this was done because Guadalupe intended on concealing the
4 origin of the cash. Based upon my training and experience, this is a tactic used by money
5 launderers to conceal the use of cash drug proceeds.

6 ***Most Recently***

7 826. On May 9, 2018, investigators saw the **silver Honda Odyssey AUJ9144**
8 and Guadalupe, identified from her Washington driver's license photograph, in the
9 parking lot of **5720 220th Street Southwest**. This property is split into two units. One
10 unit is marked "A" and the other "B." Unit A appears vacant and has a real estate lock on
11 the door. An investigator went into Unit B and spoke with a representative who identified
12 themselves as representing Morgan Handyman and Remodel and explained what services
13 were offered. The investigators noted a set of stairs to the left of the main entrance that
14 led to another door that had a keyed lock on it. It appeared to possibly lead into Unit A.

15 827. On May 13, 2018, GPS data indicated that TT47 used by Morgan was in
16 the vicinity of **5720 220th Street Southwest**.

17 828. According to the Snohomish County Assessor website, Guadalupe
18 purchased **5720 220th Street Southwest** on May 23, 2016, and then quit-claimed the
19 property to 220th Street Land Trust on April 18, 2017. Morgan Real Estate
20 Management's website currently lists the business address of **5720 220th Street**
21 **Southwest** and lists Guadalupe as the owner/operations manager. Morgan Handyman and
22 Remodel lists the business address of **5720 220th Street Southwest**, Suite A as its
23 business address.

24 829. A review of Morgan Real Estate Management's website displays a theme
25 of an M in a box which is orange and green in color. Next to it is "Morgan Real Estate
26 Management." The color theme throughout the website is green and orange. Under
27 "Contact Us" the address is listed as "5720 220th St SW" and lists Kimberly Guadalupe
28 as the "Owner/Operations Manager."

1 830. A review of Morgan Handyman and Remodel's website displays the same
2 color theme and the same M within an orange and green box next to "Morgan Handyman
3 and Remodel." Under "Contact Us," the website list address "5720 220th St SW, Suite
4 A." The website lists Guadalupe as the "Owner/Operations Manager."

5 **KNOWLEDGE BASED ON TRAINING AND EXPERIENCE**

6 831. Based upon my training and experience, and my discussions with other
7 experienced officers and agents involved in drug investigations, I know the following:

8 a. Traffickers of controlled substances, and those who assist them,
9 maintain and tend to retain accounts or records of their drug trafficking activities,
10 including lists of drug quantities and money owed, telephone records including
11 contact names and numbers, photographs, and similar records of evidentiary value.
12 These items are generally kept in locations where drug traffickers believe their
13 property is secure and will remain undetected from law enforcement, such as
14 inside their homes, vehicles, storage lockers, and businesses.

15 b. Traffickers of controlled substances commonly maintain records
16 reflecting names or nicknames, addresses, and/or telephone numbers of their
17 suppliers, customers and associates in the trafficking organization. Traffickers
18 commonly maintain this information in books or papers as well as in their cellular
19 telephones. Traffickers often maintain cellular telephones for ready access to their
20 clientele and to maintain their ongoing drug trafficking. Traffickers often change
21 their cellular telephone numbers to avoid detection by law enforcement, and it is
22 common for traffickers to use more than one cellular telephone at any one time.

23 c. Traffickers maintain evidence of their criminal activity at locations
24 that are convenient to them, including their residences, vehicles, and storage
25 lockers. This evidence often includes not only contraband and paraphernalia, but
26 also financial records, records of property and vehicle ownership, records of
27 property rented, and other documentary evidence relating to their crimes. Drug
28 traffickers sometimes take or cause to be taken photographs and/or video

1 recordings of themselves, their associates, their property, and their illegal product.
2 These individuals often maintain these photographs and recordings in their
3 possession or at their premises.

4 d. During the execution of search warrants, it is common to find
5 papers, letters, billings, documents, and other writings which show ownership,
6 dominion, and control of vehicles, residences, and/or storage units.

7 e. Persons trafficking and using controlled substances commonly sell
8 or use more than one type of controlled substance at any one time.

9 f. Traffickers frequently maintain items necessary for weighing,
10 packaging, and cutting drugs for distribution. This paraphernalia often includes,
11 but is not limited to, scales, plastic bags and cutting/diluting agents and items to
12 mask the odor of drugs.

13 g. It is common for drug dealers to also be users of their product, and
14 that it is common for the drug user to maintain paraphernalia associated with the
15 use of controlled substances.

16 h. Traffickers frequently maintain records, books, notes, ledgers, travel
17 documents, and other papers relating to the transportation and distribution of
18 controlled substances, including travel records, in locations convenient to them,
19 such as their residences and vehicles.

20 i. Traffickers frequently keep on hand amounts of United States
21 currency in order to maintain and finance their ongoing narcotics business. They
22 commonly deal in currency because of its untraceable nature. They sometimes
23 convert their illicit currency into currency equivalents such as cashier's checks and
24 money orders. Traffickers often conceal in secure locations such as their
25 residences and vehicles currency, financial instruments, precious metals, jewelry,
26 and other items of value which are the proceeds of drug transactions, and evidence
27 of consequential financial transactions relating to obtaining, transferring,
28 secreting, or spending large sums of money made from engaging in drug

1 trafficking activities, and financial books, records, receipts, notes, ledgers, diaries,
2 journals, and all records relating to income, profit, expenditures, or losses, and
3 other records showing the management of such assets. Traffickers often have
4 money counters.

5 j. Traffickers often maintain weapons, including guns, ammunition,
6 and body armor, in secure locations such as their residences and vehicles, in order
7 to protect their drugs and drug proceeds.

8 k. Traffickers often have false identification documents and
9 identification documents in the names of others in order to conceal their identities.

10 l. Traffickers very often place assets in names other than their own, or
11 use fictitious names and identification, to avoid detection of these assets by
12 government agencies, and that even though these assets are in other persons'
13 names, the drug dealers actually own and continue to use these assets and exercise
14 dominion and control over them.

15 m. Illegal drug trafficking is a continuing activity over months and even
16 years. Illegal drug traffickers will repeatedly obtain and distribute controlled
17 substances on a somewhat regular basis, much as any distributor of a legitimate
18 commodity would purchase stock for sale and, similarly, such drug traffickers will
19 have an "inventory" which will fluctuate in size depending upon various factors to
20 include the demand and supply for the product. I would expect the trafficker to
21 keep records of his illegal activities for a period of time extending beyond the time
22 during which he actually possesses illegal controlled substances, in order that he
23 can maintain contact with his criminal associates for future drug transactions, and
24 so that he can have records of prior transactions for which, for example, he might
25 still be owed money, or might owe someone else money. These records are often
26 created in code.

27 832. As noted above, drug dealers use cellular telephones as a tool or
28 instrumentality in committing their criminal activity. They use them to maintain contact

1 with their suppliers, distributors, and customers. They prefer cellular telephones because,
2 first, they can be purchased without the location and personal information that land lines
3 require. Second, they can be easily carried to permit the user maximum flexibility in
4 meeting associates, avoiding police surveillance, and traveling to obtain or distribute
5 drugs. Third, they can be passed between members of a drug conspiracy to allow
6 substitution when one member leaves the area temporarily. Since cellular phone use
7 became widespread, every drug dealer I have contacted has used one or more cellular
8 telephones for his or her drug business. I also know that it is common for drug traffickers
9 to retain in their possession phones that they previously used, but have discontinued
10 actively using, for their drug trafficking business. Based on my training and experience,
11 the data maintained in a cellular telephone used by a drug dealer is evidence of a crime or
12 crimes. This includes the following:

13 a. The assigned number to the cellular telephone (known as the mobile
14 directory number or MDN), and the identifying telephone serial number
15 (Electronic Serial Number, or ESN), (Mobile Identification Number, or MIN),
16 (International Mobile Subscriber Identity, or IMSI), or (International Mobile
17 Equipment Identity, or IMEI) are important evidence because they reveal the
18 service provider, allow us to obtain subscriber information, and uniquely identify
19 the telephone. This information can be used to obtain toll records, to identify
20 contacts by this telephone with other cellular telephones used by co-conspirators,
21 to identify other telephones used by the same subscriber or purchased as part of a
22 package, and to confirm if the telephone was contacted by a cooperating source or
23 was intercepted on a wiretap here or in another district.

24 b. The stored list of recent received calls and sent calls is important
25 evidence. It identifies telephones recently in contact with the telephone user. This
26 is valuable information in a drug investigation because it will identify telephones
27 used by other members of the organization, such as suppliers, distributors, and
28 customers, and it confirms the date and time of contacts. If the user is under

1 surveillance, it identifies what number he called during or around the time of a
2 drug transaction or surveilled meeting. Even if a contact involves a telephone user
3 not part of the conspiracy, the information is helpful (and thus is evidence)
4 because it leads to friends and associates of the user who can identify the user,
5 help locate the user, and provide information about the user. Identifying a
6 defendant's law-abiding friends is often just as useful as identifying his drug-
7 trafficking associates.

8 c. Stored text messages are important evidence, similar to stored
9 numbers. Agents can identify both drug associates, and friends of the user who
10 likely have helpful information about the user, his location, and his activities.

11 d. Photographs on a cellular telephone are evidence because they help
12 identify the user, either through his or her own picture, or through pictures of
13 friends, family, and associates that can identify the user. Pictures also identify
14 associates likely to be members of the drug trafficking organization. Some drug
15 dealers photograph groups of associates, sometimes posing with weapons and
16 showing identifiable gang signs.

17 e. Stored address records are important evidence because they show the
18 user's close associates and family members, and they contain names and
19 nicknames connected to phone numbers that can be used to identify suspects.

20 JUSTIFICATION FOR NIGHTTIME SERVICE

21 833. During the course of this investigation, investigators have seized numerous
22 firearms. Additionally, during the course of this investigation, subjects of this
23 investigation or those associated with them have or are suspected to be involved in
24 incidents of murder, assaults with the use of firearms, and other crimes of violence.
25 Currently, daybreak is occurring very early. Investigators intend to serve these warrants
26 at 5:00 a.m., increasing the likelihood subjects are asleep as those serving the search
27 warrants approach the residences, decreasing the likelihood of subjects arming
28 themselves or destroying evidence prior to investigators knocking and announcing.

CONCLUSION

834. Based on the above-described information, there is probable cause to believe that contained within the locations and vehicles, described in Attachment A, there exists evidence, fruits, and instrumentalities, as described in Attachment B, of violations of 21 U.S.C. §§ 841 and 846 (distribution of, and possession with intent to distribute, controlled substances, and conspiracy to do the same), 21 U.S.C. § 843(b) (use of communication facilities to commit, facilitate, or further an act or acts which constitute a felony), and 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h) (money laundering and conspiracy to do the same), committed by Michael Morgan, Charles Cheatham, Michael Davis, Railen Wheeler, Joseph Wilson, Crystal Barquet, Wesley Armstrong, Nakita Cannady, Nathaniel Wells, Adam Smith, Marqus Jones, Michael Safford, Jerome Wilson, Alonzo Baggett, Eddrick Baker, Martin Banks, Branden Barnett, Carlos Dennis, Dominique Jimerson, Bradford Street, Donnie Cheatham, Ventoe Woods, Michael Young, Cleophus Shepard, Luis Perez-Cruz, Tiffany Younger, Lamont Reynolds, Waunika Walker, Rasheed Echols, Stacy Humphrey, Mechellay Broadnax, Nonis Clayton, Carlisa McNeal, Santichith Hochingnavong, Chryar Mitchell, Danavian Hunter, Calvin Thomas, Walter Robinson, James Mayers, Leonard Haywood, Bobby Beasley, Antonio Wiggins, Dennis Herold, Jakari Armstrong, Christopher Clay, Patrick Williams, Johnny Davis, Ernie Davis, Larry Holloway, Jihad Zeigler, Edward Locke, Lovell Brown, Jevon

///

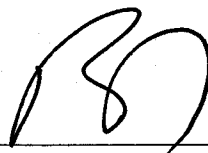
///

1 Gipson, Robert Otero, Tabid Mohamed, Jon Williams, Anthony Dao, and Kimberly
2 Guadalupe.

3
4 

5
6 Richard Huntington
7 Task Force Officer
8 Drug Enforcement Administration

9
10 SUBSCRIBED AND SWORN before me this 1 day of June, 2018.

11 

12
13 THE HONORABLE BRIAN A. TSUCHIDA
14 United States Magistrate Judge